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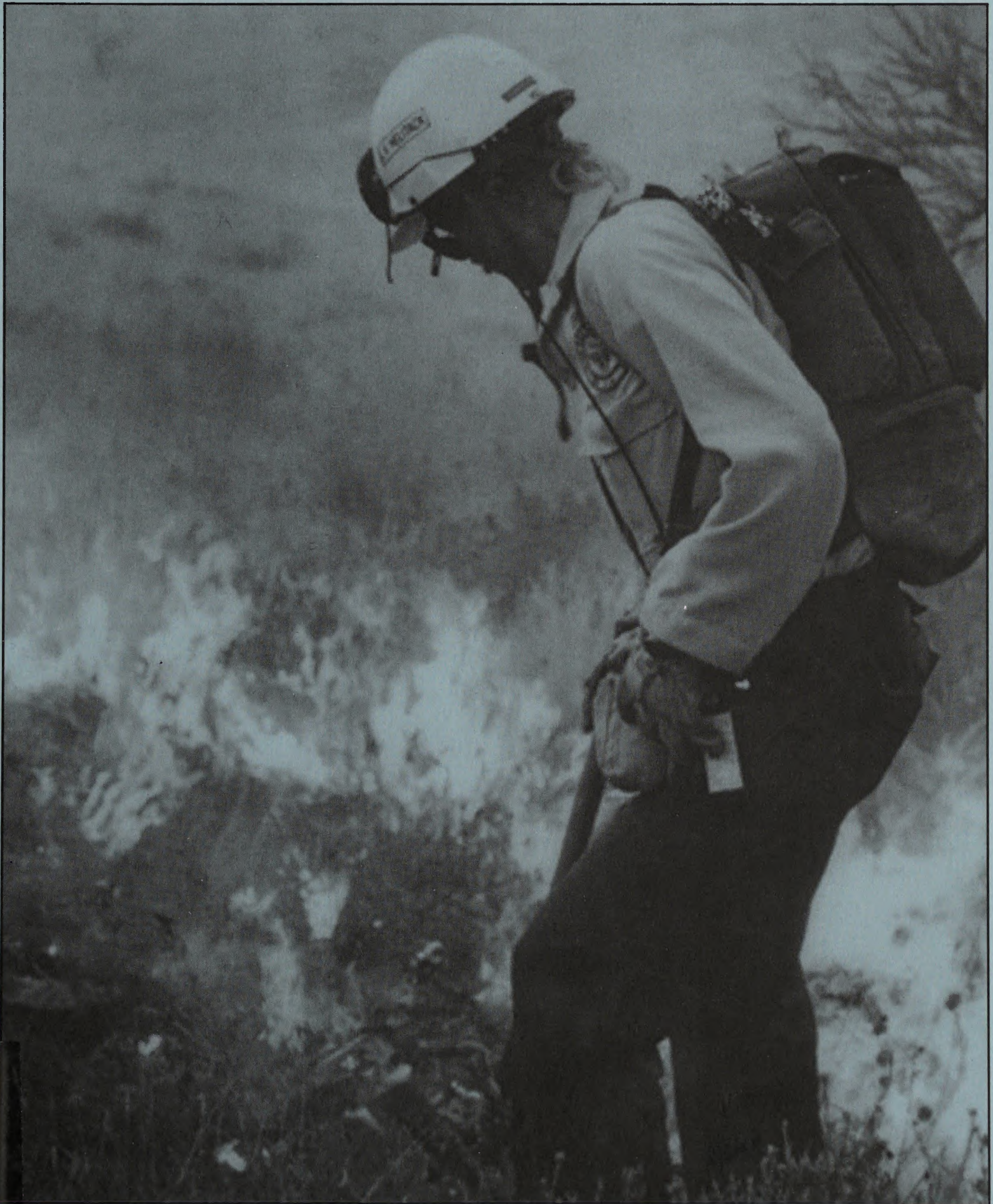
United States Department of the Interior
Bureau of Land Management

Montana State Office

July 2003



FIRE/FUELS MANAGEMENT PLAN ENVIRONMENTAL ASSESSMENT/ PLAN AMENDMENT for MONTANA AND THE DAKOTAS



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The Bureau of Land Management is responsible for the stewardship of our public lands. It is committed to manage, protect, and improve these lands in a manner to serve the needs of the American people for all times. Management is based on the principles of multiple use and sustained yield of our nation's resources within a framework of environmental responsibility and scientific technology. These resources include recreation; rangelands; timber; minerals; watershed; fish and wildlife; wilderness; air; and scenic, scientific, and cultural values.

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BUREAU OF LAND MANAGEMENT

Montana State Office
5001 Southgate Drive, P.O. Box 36800
Billings, Montana 59107-6800
<http://www.mt.blm.gov/>



In Reply To:
1600/9210(923)

Dear Reader:

Enclosed is the Fire and Fuels Management Environmental Assessment (EA)/Plan Amendment for the Bureau of Land Management (BLM) in Montana and the Dakotas. This document replaces the Fire Management Plan EA that was available for public review in August 2001. After the EA was released in August 2001, the analysis was expanded to consider mechanical fuels treatments, chemical weed treatments to support fuels treatments, and other land use plan decisions necessary to implement the National Fire Plan and 2001 Federal Wildland Fire Management Policy. The EA has also been updated in response to the 35 public comment letters that have been submitted since August 2001.

Additional copies of this plan are available at each of the BLM field offices in Billings, Butte, Dillon, Glasgow, Great Falls, Havre, Lewistown, Malta, Miles City, Missoula, Dickinson (ND) and Belle Fourche (SD). A copy is also available on the internet at www.mt.blm.gov.

You have the right to protest the State Director's decision on the proposed plan amendments if you believe that you or your interests will be negatively affected by the proposed management, and if 1) you can document that you have participated in the planning process and 2) during the planning process, you raised for the record the issue(s) that you wish to protest.

Protest letters should include:

1. The name, mailing address, phone number, and interest of the person filing the protest;
2. A statement of the issue or issues being protested;
3. A statement of the part or parts of the plan amendment being protested;
4. A copy of all documents addressing the issue that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record; and
5. A concise statement of why the State Director's proposed decision is believed to be incorrect. Include documentation of relevant facts and reference or cite planning documents, environmental analysis documents, available planning records (i.e. meeting minutes or summaries, correspondence, etc.), and include this material with the protest letter.

ITEM HAS BEEN DIGITIZED

Protest letters must be filed in writing to:

(Regular Mail)

Director, Bureau of Land Management
Attention: Ms. Brenda Williams, Protest Coordinator
P.O. Box 66538
Washington, D.C. 20035

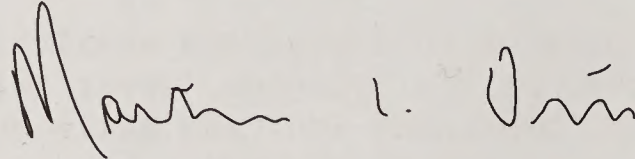
(Overnight Mail)

Director, Bureau of Land Management
Attention: Ms. Brenda Williams, Protest Coordinator
1620 L Street, N.W., Room 1075
Washington, D.C. 20036

The protest period will close on August 30, 2003. To be considered timely, the protest must be sent to the Director and must be postmarked no later than August 30, 2003.

Thank you for your continuing interest and participation in the planning process. If you have any questions, please contact John Thompson at (406) 896-5030 at the BLM Montana State Office.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin C. Ott". The signature is fluid and cursive, with the first name "Martin" being more prominent and the last name "Ott" following in a similar style.

Martin C. Ott
State Director

United States Department of the Interior
Bureau of Land Management

FIRE/FUELS MANAGEMENT PLAN
ENVIRONMENTAL ASSESSMENT/
PLAN AMENDMENT

FOR

MONTANA AND THE DAKOTAS

Montana State Office
Billings, Montana

July 2003

Contents

| | |
|---|-----------|
| Chapter 1 - Purpose of and Need for Action | 1 |
| Purpose of the Proposed Action | 1 |
| Need for the Proposed Action | 1 |
| Goals | 3 |
| Scope of the Analysis | 3 |
| Decisions to be Made | 5 |
| Applicable Legal and Regulatory Restraints and Coordination | 6 |
| Additional Relevant BLM Policy and Plan/Agreements | 6 |
| Chapter 2 - Alternatives Including the Proposed Action | 9 |
| Introduction | 9 |
| History of the Planning and Alternative Development Process | 9 |
| Alternative Design, Evaluation, and Selection Criteria | 9 |
| Alternatives Considered but Eliminated from Detailed Study | 10 |
| Description of the Alternatives | 11 |
| Summary Comparison of Alternatives | 20 |
| Identification of the Preferred Alternative | 20 |
| Chapter 3 - Affected Environment and Environmental Consequences | 23 |
| Introduction | 23 |
| Vegetation | 27 |
| Air Quality (BLM Critical Element) | 35 |
| Soils | 37 |
| Water Quality (BLM Critical Element) | 39 |
| Aquatics Habitats and Species | 40 |
| Terrestrial Habitats and Species | 45 |
| Federally Threatened, Endangered, and Proposed Species (BLM Critical Element) | 55 |
| Cultural (BLM Critical Element) and Paleontological Resources | 64 |
| Areas of Critical Environmental Concern (BLM Critical Element) | 65 |
| Prime or Unique Farm Lands (BLM Critical Element) | 65 |
| Floodplains (BLM Critical Element) | 67 |
| Invasive and Non-Native Species (BLM Critical Element) | 67 |
| Native American Religious Concerns (BLM Critical Element) | 67 |
| Wastes, Hazardous or Solid (BLM Critical Element) | 67 |
| Wetlands/Riparian Zones (BLM Critical Element) | 67 |
| Wild and Scenic Rivers (BLM Critical Element) | 67 |
| Recreation and Visual Resources | 67 |
| Wilderness (BLM Critical Element) and Wilderness Study Areas | 68 |
| Environmental Justice (BLM Critical Element) | 70 |
| Social, Human Health and Safety | 70 |
| Economics | 71 |
| Relationship Between Short-term Uses and Long-term Productivity | 72 |
| Chapter 4 - Consultation and Coordination | 73 |
| Public Notices, External and Internal Input | 73 |
| Consultation and Coordination | 73 |
| Initial Public Input | 74 |
| Public Comments on the Fire Management Plan/Plan Amendment Environmental Assessment | 74 |
| Public Comment on Revised EA | 77 |

Glossary 79

References 85

Appendices

 A. Maps of Fire Management Zones Under the Proposed Action 93

 B. Wildlife Design Features Under the Proposed Action 103

 C. Resource Management Plan Amendments Under the Proposed Action 105

 D. Description of the Riparian Protection Zone Strategy (Proposed Action) 107

Finding of No Significant Impact 109

Acronyms and Chemical Symbols

| | | | |
|----------|--|------------------|--|
| ACEC | Areas of Critical Environmental Concern | MIST | Minimum Impact Suppression Tactics |
| AQRV | Air Quality Related Values | MOA | Memorandums of Agreement |
| ASQ | Allowable Sale Quantities | MOU | Memorandum of Understanding |
| BFO | Billings Field Office | MT-GAP | Montana Gap Analysis |
| BLM | Bureau of Land Management | NDFO | North Dakota Field Office |
| BMPs | Best Management Practices | NEPA | National Environmental Policy Act |
| BuFO | Butte Field Office | NFP | National Fire Plan |
| CEQ | Council on Environmental Quality | NO ₂ | Nitrogen Dioxide |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 | NRHP | National Register of Historic Places |
| CFR | Code of Federal Regulations | OHV | Off Highway Vehicle |
| DEQ | Department of Environmental Quality | ONA | Outstanding Natural Areas |
| DFO | Dillon Field Office | PF | Prescribed Fire |
| DIO | Department of Interior | PM ₁₀ | Particulate Matter |
| EA | Environmental Assessment | PSD | Prevention of Significant Deterioration |
| EIS | Environmental Impact Statement | RCRA | Resource Conservation and Recovery Act |
| EO | Executive Order | RMP | Resource Management Plan |
| ESA | Endangered Species Act | ROW | Rights of Way |
| ESR | Emergency Site Rehabilitation | SDFO | South Dakota Field Office |
| FMZ | Fire Management Zone | SHPO | State Historic Preservation Officer |
| FO | Field Office | SMT | State Management Team |
| FS | Forest Service | SMZ | Streamside Management Zone |
| FWFMP | Federal Wildland Fire Management Policy | SO ₂ | Sulfur Dioxide |
| HRV | Historic Range of Variation | SRMA | Special Recreational Management Areas |
| ID | Interdisciplinary | SSS | Special Status Species |
| IDT | Interdisciplinary Team | T & E | Threatened and Endangered Species (federal) |
| IMP | Interim Management Policy | TMDL | Total Maximum Daily Load |
| LFO | Lewistown Field Office | UMNWSR | Upper Missouri National Wild and Scenic River |
| MBF | Board Feet | USDA | United States Department of Agriculture |
| MMBF | Million Board Feet | VRM | Visual Resource Management |
| MBTA | Migratory Bird Treaty Act | WA | Wilderness Areas |
| MCFO | Miles City Field Office | WAFWA | Western Association of Fish and Wildlife Agencies |
| MDFW & P | Montana Department of Fish, Wildlife and Parks | WFSA | Wildland Fire Situation Analysis |
| MFO | Malta Field Office | WSA | Wilderness Study Areas |
| MFP | Management Framework Plan | WUI | Wildland Urban Interface |
| MiFO | Missoula Field Office | | |

Chapter 1.0: Purpose of and Need for Action

1.1 Purpose of the Proposed Action

The Bureau of Land Management (BLM) proposes to improve its implementation of the National Fire Plan and 2001 Federal Fire Policy, by amending all Resource Management Plans (RMPs) in Montana, North Dakota, and South Dakota, to update direction for fire and fuels management.

These amendments would: 1) provide consistent fire management direction by assigning fire management categories and broad levels of treatment as directed by BLM Handbook H-1601-1 (Nov. 22, 2000), Appendix C; 2) provide general guidance for fire management (including both fire suppression and fuels management) needed to protect other resource values, and 3) revise specific RMP decisions that currently limit BLM's ability to conduct safe and efficient mechanical hazardous fuels treatments in the Judith-Valley-Phillips (JVP), West HiLine, Billings; and Miles City Big Dry and Powder River planning areas.

The following BLM Montana/Dakotas RMPs would be amended: Big Dry, Billings, Garnet, Headwaters, Judith-Valley-Phillips, North Dakota, Powder River, South Dakota, and West HiLine.

The Dillon Management Framework Plan (MFP) would not be amended by this EA/plan amendment. The Dillon Field Office is currently working on the Dillon RMP/EIS, and fire and fuels management decisions will be made through that planning process.

Planning areas are displayed on Map 1.

1.2 Need for the Proposed Action

National fire management policy has evolved in response to the increased fatalities, property loss, local economic disruptions, and risk to ecosystems associated with increasingly catastrophic wildland fire seasons. The Federal Wildland Fire Management Policy and Program (1995) was developed (and then updated) after severe fire seasons in 1994 and 2000. The 2000 fire season also prompted a report from the Secretaries of Agriculture and the Interior, which eventually became the basis of the *National Fire Plan*.



The Grizzly Gulch fire, burning near Deadwood on 6/29/03. Credit Tom Warner, Warner Images.

The *National Fire Plan* and the *2001 Federal Fire Policy* both indicated that federal agencies must change their fire management practices to increase protection of human life and decrease natural resource and private property damage. Specifically, the *2001 Federal Fire Policy* established that the deteriorating condition of fire-adapted ecosystems is the result of fire exclusion, that the fire hazard in fire-adapted ecosystems is worse than previously thought, and that the extent of the fire hazard in the WUI was not fully recognized in 1995.

BLM planning documents have not kept pace with national fire and fuels management policies, nor do they reflect the condition of BLM-administered lands in terms of fuels (and associated risks to ecosystems and communities) in Montana and North and South Dakota.

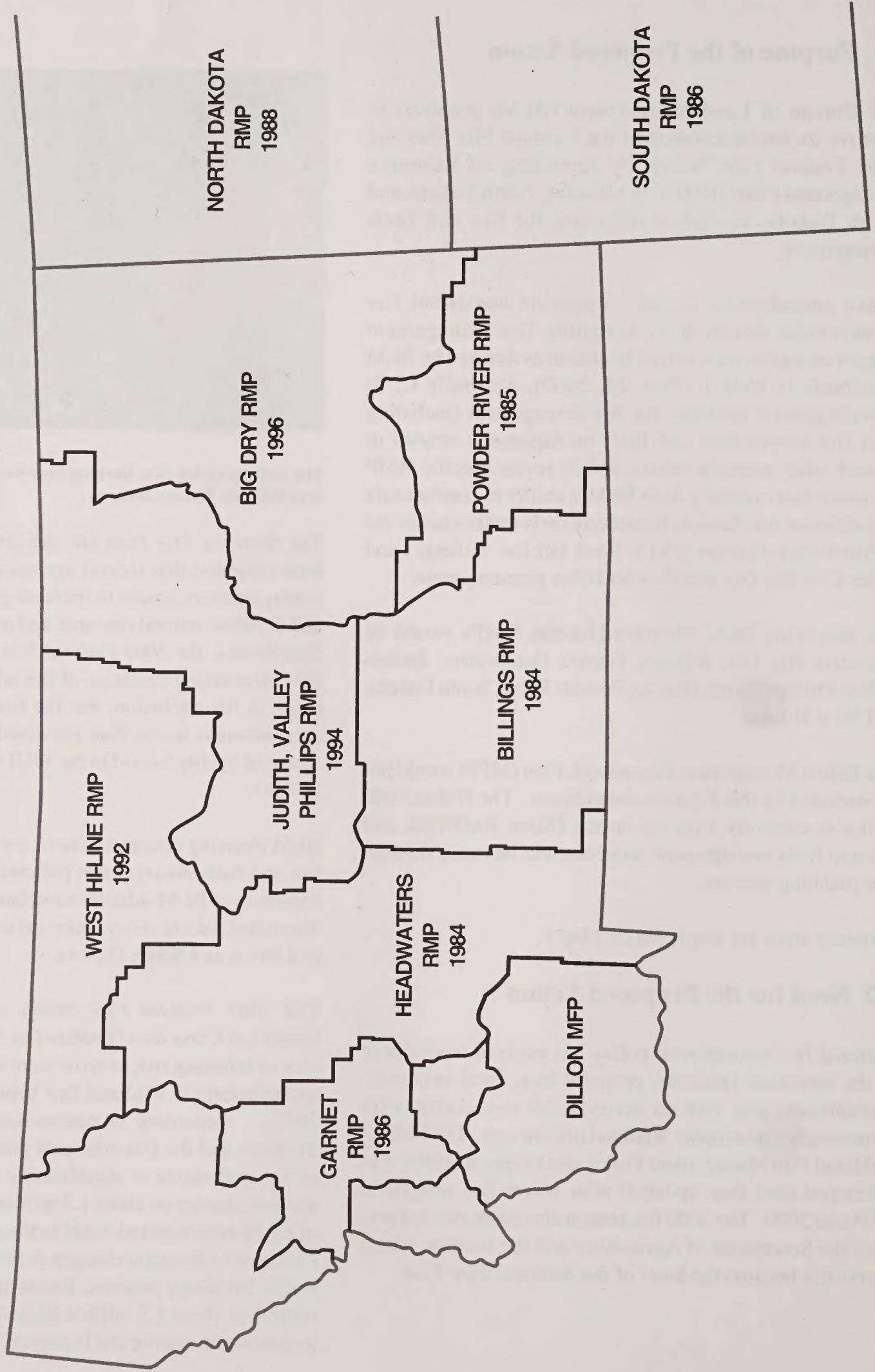
The *2001 Federal Fire Policy* referenced preliminary Condition Class data (finalized as Schmidt et al 2002) as a way of inferring risk to ecosystem sustainability and risk of uncharacteristic wildland fire behavior and effects (Hann 2002). According to coarse-scale spatial estimates for Montana and the Dakotas, past policies and activities have either moderately or significantly altered the fire regimes and frequencies on about 1.3 million of the 8.4 million acres of BLM-administered lands in the study area. The result is moderate to dramatic changes in fire size, intensity, severity, and/or landscape patterns. Based on estimates of vegetation condition, these 1.3 million BLM-administered acres need treatments to restore the historical fire regime.

Risk to communities has been projected in response to nationwide inquiries related to the *National Fire Plan* (i.e.

MAP 1

MONTANA/DAKOTAS

RMP/MFP BOUNDARIES



Communities at Risk published in the August 17, 2001 Federal Register). Montana/Dakotas BLM Field Office staff also completed in 1999 a survey on communities within 1/2 mile of fuels buildups on BLM lands. Of 79 priority communities identified as part of the 1999 survey, 67 had moderate to high escaped fire potential and/or moderate to high potential for loss of life or property. Since that survey was completed, wildland fire has occurred in or near six of the priority communities. Map 2 shows communities/areas at risk from wildland fire on public lands.

The proposed action was developed to respond to national policy and hazardous fuels conditions on BLM-administered lands in Montana, North Dakota, and South Dakota.

1.3 Goals

A change in fire management strategies is needed to:

- provide greater protection to human life
- reduce the risk and cost of severe wildland fires
- sustain the ecological health and function of fire-adapted grasslands, shrublands, and forestlands
- minimize the adverse effects of wildland fire suppression
- use fire and other fuels management methods to reduce hazardous fuels while meeting other resource objectives (e.g., restore degraded fish and wildlife habitat)

1.4 Scope of the Analysis

Fire/fuels management is considered in this analysis at the regional RMP level. The level of detail regarding proposed activities and potential effects will be appropriate to this first tier of BLM's land use planning process. This "big picture" view of the proposed action in Montana, North Dakota, and South Dakota includes a consideration of statewide land use plan management direction and guidance for fire suppression and treatments to reduce hazardous fuels. This analysis also considers the cumulative effects of BLM fire/fuels management activities.

This analysis considers effects of statewide guidance for wildland fire suppression as well as general effects of suppression activities.

Vegetation treatments and their environmental effects are analyzed at the programmatic level if their purpose is to reduce hazardous fuels. The effects of vegetation treatments that are not associated with fuels management have already been considered in BLM Resource Management Plans (RMPs) for Montana and the Dakotas and in the 1991 BLM Vegetation Treatment EIS.

Specific information, effects, and activities associated with site-specific projects are not considered in this analysis.

Following this analysis, an updated Fire Management Plan (FMP) will be prepared by each field office. Local-level environmental analyses will be completed when individual projects are proposed. These analyses will study the most effective ways to apply the management direction provided by RMP-level plans to local and "on-the-ground" resource issues and values.

1.4.1 History of the Planning and Public Participation Process

The planning process began in September 1998, when BLM published a Notice of Intent (NOI) to prepare a NEPA document in the Federal Register.

The project leader sent 5,067 letters to potential interested parties identified by the Field Offices. The letters explained the planning process and asked for issues and/or a reply from those who wanted to remain on the mailing list.

The State Director sent a similar letter to 115 other federal, state, and local agencies.

The BLM Fire Management Officer sent a letter asking for issues and concerns from 48 fire wardens.

The BLM initiated contact with a number of different agencies, including:

- Northern Rockies Coordinating Representatives
- Forest Service
- MT Dept. of Fish, Wildlife, & Parks
- County Commissioners in counties where fuels reduction activities would likely take place.

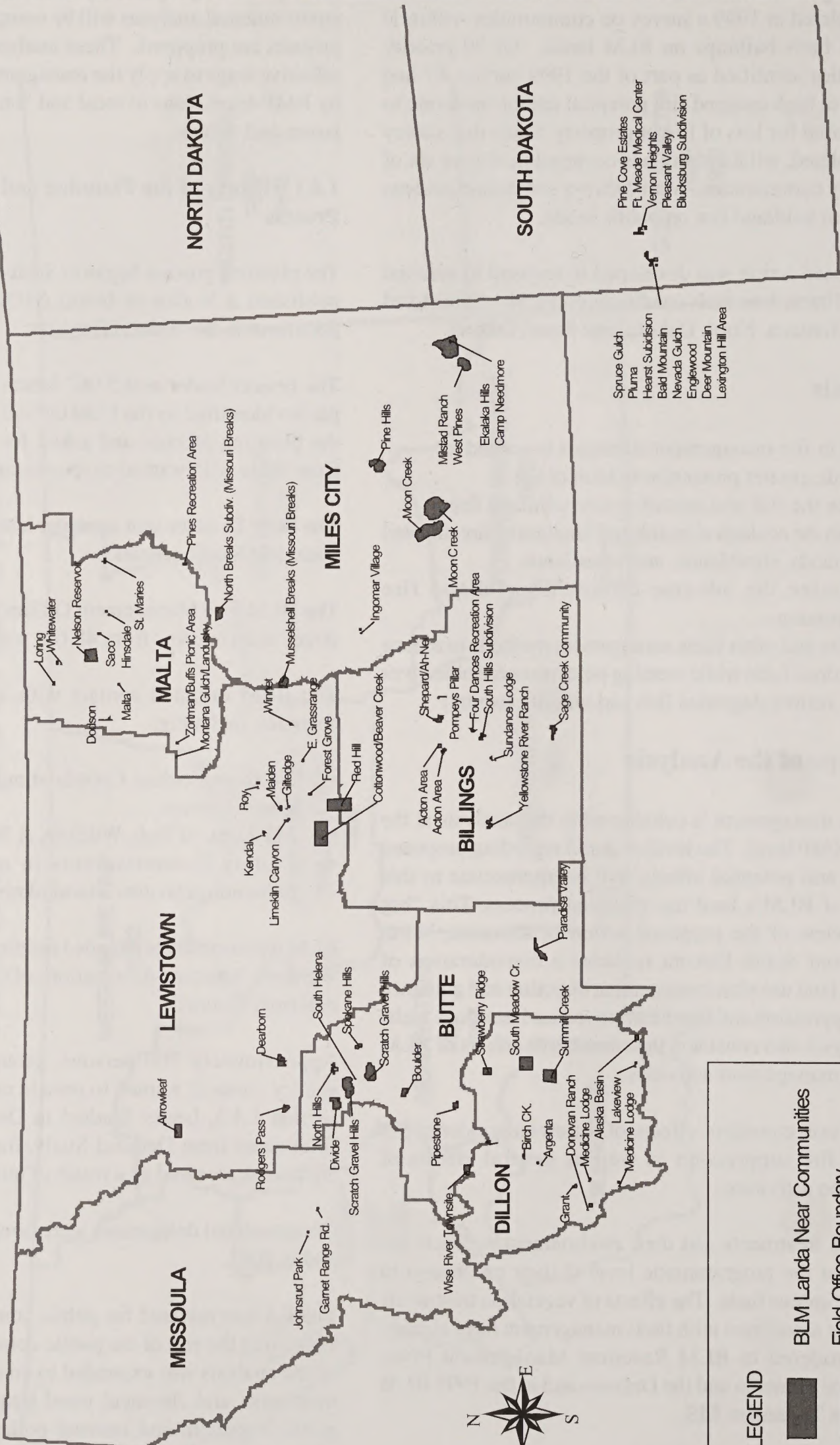
BLM representatives attended meetings of the Montana Fire Wardens, Montana Associations of Counties, and Resource Advisory Council.

Approximately 700 persons, groups/organizations, and agency contacts wanted to remain on the mailing list. See section 1.4.3, Issues Studied in Detail, and 1.4.4, Issues Eliminated from Detailed Study, for a summary of public comments received as a result of initial mailings.

Congressional delegations were briefed at project initiation and in 2001.

The EA was released for public comment in August 2001. Following the end of the public comment period, the scope of the analysis was expanded to consider mechanical fuels treatments and chemical weed treatments, in response to public comment and internal policy direction (IM-2002-034).

MAP 2



1.4.2 Relevant Planning Documents

- Billings RMP (1984)
- Butte Headwaters RMP(1984)
- Dillon MFP(1979)
- Lewistown Judith RMP (1994)
- Lewistown West HiLine RMP(1988; 1992 for protested portions)
- Malta Phillips RMP (1994)
- Malta Valley RMP (1994)
- Miles City Big Dry RMP (1996)
- Miles City Powder River RMP (1985)
- Missoula Garnet RMP (1986)
- North Dakota RMP (1988)
- South Dakota RMP (1986)
- OHV Amendment/EIS (Pending Protest Resolution)
- Standards for Rangeland Health and Guidelines for Grazing Management EIS (1997)
- Vegetation Treatments on BLM-administered lands in 13 western States EIS (1991)
- Northwest Area Noxious Weed Control Program EIS
- Vegetation Treatments Programmatic EIS (not completed)
- Wilderness Management Plan for the Bear Trap Canyon Unit of the Lee Metcalf Wilderness

1.4.3 Issues/Questions Studied in Detail

- Where is fire not desired at all; where is unplanned wildland fire likely to cause negative effects; where is fire desired to manage ecosystems, but current vegetative conditions create constraints on use; and where is fire desired, and there are no constraints on its use?
- What types and amounts of fuels treatments could be reasonably anticipated over the next 10 years?
- What direct, indirect, and cumulative effects on resources would be caused by the types and amounts of treatments identified?
- If unacceptable adverse impacts are anticipated, how might impacts be minimized, mitigated, or avoided?
- What effects would occur if treatments are not undertaken?

1.4.4 Issues Eliminated from Further Study

Most issues and comments received as the result of the initial mailing are examined further within this analysis.

Other issues dealt more directly with the BLM's response to wildland fire, including the possibilities of BLM providing more equipment for fire suppression; BLM paying local fire

departments to fight fires; fixing dams to provide a more accessible source of water for fire suppression; and allowing private parties to have a more direct role in the fire suppression process. These concerns may have a place in future suppression and budget actions or analyses. However, the scope of this analysis is concerned with examining how to align BLM suppression and fuels treatment policy to be consistent with the 2001 Federal Fire Policy and the National Fire Plan.

1.5 Decisions to be Made

Based on this analysis, the BLM Montana/Dakotas State Director will decide whether to amend land use plans that include:

1. Fire management zones and categories for all RMPs.
2. The EA discloses the cumulative effects of adopting the Proposed Action including broad levels of fuels treatments, wildland fire suppression, and associated support treatments (i.e. chemical weed treatments) in RMPs.
3. General guidance for fire management to protect other resources and values for all RMPs.
4. Revised specific decisions in the Billings, Big Dry, JVP, Powder River, and West HiLine RMPs to improve ability to implement of the National Fire Plan and 2001 Federal Fire Policy.

The Dillon Field Office is in the process of developing an RMP/EIS to replace the Dillon Management Framework Plan (MFP). The final decisions will be approved in the Dillon RMP/EIS and not through this planning process; however, likely categories are included here to allow cumulative analysis. Potential fuels treatments in the Dillon Field Office are also included in the levels of treatment associated with this proposed action.

The State Director may decide to implement the proposed alternative, to take no action, or to examine and select another alternative. Any new programmatic direction selected by the State Director would apply to BLM-administered lands in Montana and the Dakotas.

The State Director will not authorize specific hazardous fuels reduction projects based on this analysis. As described in section 1.4, each Field Office would prepare an updated, NEPA-compliant Fire Management Plan and appropriate site-specific NEPA analyses for individual projects. These analyses may include more specific fire management objectives and guidance to protect unique resource values within project areas.

1.6 Applicable Legal and Regulatory Restraints and Coordination

Under either alternative, the BLM would comply with the constraints and processes imposed by the following laws, policies, and legal/regulatory agreements, both on this plan and any future site-specific plans that tier to it:

- Endangered Species Act of 1973: Fire suppression, rehabilitation, fuel reduction treatments, and related activities would comply with the Endangered Species Act (ESA) including, but not limited to, Sections 7(a)(1) for conservation of species and Section 7(a)(2) for consultation on actions that May Affect species. This shall include consultation on effects from BLM actions or authorizations that may extend onto private, state, tribal, or other land ownership. Section 7 consultations will be completed on this programmatic plan and on any future site-specific wildfire restoration, prescribed burn or fuels reduction NEPA analyses that May Affect listed species or critical habitat.
- Emergency Section 7 Consultation: Federal regulations (50 CFR 402.05) recognize the need for expedited consultation in response to natural disaster (including wildland fire) or other calamity. Where emergency actions (including fire suppression) are required that may affect listed species and/or critical habitats, the action agency shall initiate consultation, usually by phone or facsimile, at the first opportunity. Emergency consultation procedures allow action agencies to incorporate endangered species concerns into their actions during the response to an emergency. Under no circumstance where human life is at stake should an emergency response decision be delayed due to administrative work required by the consultation regulations.
- All site-specific fuels reduction projects would be coordinated with the State Historic Preservation Officer (SHPO). In addition, the SHPO would be notified of certain surface-disturbing actions taken during fire suppression.
- BLM will comply with the provisions of the National Historic Preservation Act of 1966 (NHPA), including Native American consultation, through existing programmatic agreements. In the absence of such agreements, the BLM will adhere to regulations found at 36 CFR 800. Projects subject to the NHPA include fire suppression/restoration activities and fuels reduction projects.
- In Montana, burn permits for site-specific projects would be coordinated with the MT Dept. of Environmental Quality, Air Quality Division. This

analysis does not authorize any projects itself, so burn permits would not be obtained until the site-specific planning level.

- Additional legal and regulatory authorities relevant to this proposed action:
 - The Clean Air Act
 - Federal Land Policy and Management Act of 1976
 - Archaeological Resource Protection Act of 1974
 - IM no. 99-032 (Cultural Resources Protection for prescribed fire activity)
 - Executive Order 12898 (Environmental Justice)
 - American Indian Religious Freedom Act of 1978
 - Native American Graves Protection and Repatriation Act of 1990
 - Resource Conservation and Recovery Act of 1976
 - Comprehensive Environmental Response, Compensation, and Liability Act of 1980
 - Safe Drinking Water Act of 1974, as amended
 - Clean Water Act of 1977, as amended by the Water Quality Act of 1987, including total maximum daily load (TMDL) requirements
 - Migratory Bird Treaty Act of 1918
 - Executive Order 13186 (Implementation of MBTA, 2001)
 - Migratory Bird Conservation Act of 1929
 - Fish and Wildlife Coordination Act of 1934
 - Bald and Golden Eagle Protection Act of 1940
 - Executive Order 11990 (Protection of Wetlands)
 - Wild and Scenic Rivers Act of 1968, as amended
 - Wilderness Act of 1964
 - Lacey Act, as amended (invasive/nonnative species)
 - Federal Noxious Weed Act of 1974, as amended
 - Executive Order 13112, Invasive Species

7.7 Additional Relevant BLM policy and Plans/Agreements

The following policies and plans/agreements typically guide development and implementation of individual projects. These policy documents and agreements are listed here to provide a reference as Fire Management Plans and site-specific project plans are developed.

Standard Operating Procedures and Manual/Handbook Guidance

- Standards for Fire and Aviation Operation (Red Book): Contains procedures for protecting environmental qualities during fire suppression and fuels management activities.
- Air: State regulations and implementation plans as

specified in Manual Section 9210 (Fire Planning), and the Montana/Idaho Airshed Group Operating Guide

- Burned Area Emergency Stabilization and Rehabilitation (ESR) Handbook, including the BLM-specific exhibit
- Native American Consultation: Manual 8160 and Handbook H-8160-1
- OHV: Manual 8340 and State Director memo IM no. MT-2001-004
- Prescribed Fire Management Handbook; Manual 9214
- Special Status Species: Manual 6840
- Visual: Manual 8410, Handbook H-8410-1 and H-8431-01. IB 98-135 and IBLA decision 98-100
- Water: Streamside Management Zone (SMZ) guidance as described in state law (MCA-77-5-301 to 307) and Water Quality Best Management Practices for Montana Forests (BMPs)
- Wilderness and Wilderness Study Areas: Manual Section 1742 and Handbook H-1742-1. Manual section 8500, H-8560-1, H-8550-1. Interim Management Policy for WSAs
- Weeds: BLM Manual 9011, H9011-1 Chemical Pest Control Guidance, and Partners Against Weeds: An Action Plan for the Bureau Of Land Management

Agreements related to Species Conservation and Recovery:
BLM would comply with existing agreements regarding the following Conservation and Recovery Plans or Strategies and/or Memorandums of Understanding (MOUs).

- Montana Bald Eagle Management Plan
- Interior Least Tern Recovery Plan
- Piping Plover Recovery Plan
- Black-footed Ferret Recovery Plan
- Montana Black-footed Ferret Recovery Strategy
- Grizzly Bear Recovery Plan
- Interagency Grizzly Bear Guidelines
- Gray Wolf Recovery Plan
- Canada Lynx Conservation Agreement and Strategy
- Interim Bull Trout Habitat Conservation Strategy and Implementation
- Bull trout recovery plan
- Westslope Cutthroat Trout Conservation Agreement and Implementation Strategy
- Cooperative Conservation Agreement for Yellowstone Cutthroat Trout
- Montana Fluvial Arctic Grayling Restoration Plan
- Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana
- North Central Montana Black-footed Ferret Reintroduction and Management Plan
- MOU Among Western Association of Fish and Wildlife Agencies (WAFWA) and U.S. Department of Agriculture, Forest Service, and U.S. Department of Interior, Bureau of Land Management, and U.S. Department of Interior, Fish and Wildlife Service. 2000.

Chapter 2.0: Alternatives Including the Proposed Action

2.1 Introduction

“Alternatives Including the Proposed Action” is the heart of this EA. This chapter describes the alternatives. Consideration of the Proposed Action is then based on comparison to the No Action alternative and on the analysis presented in Chapter 3.0 (Affected Environment and Environmental Consequences).

The comparison of the alternatives highlights differences between current fire management policies/strategies and the direction provided by the *2001 Review and Update of the Federal Wildland Fire Management Policy (2001 Federal Fire Policy)*.

This chapter identifies how existing land use plan decisions could be amended to reduce accumulations of wildland fuels and help achieve resource objectives.

2.2 History of the Planning and Alternative Development Process

The alternative development process began in January 1998. The following narrative summarizes the alternative development process; a full accounting, including dates, is found in Chapter 4.0

- BLM staff initiated public participation by asking representatives from other groups, agencies, and organizations to identify issues and concerns. The State Director, State Fire Management Officer, and Project Leader also mailed letters to potentially interested/affected agencies, groups, and individuals asking for issues and concerns. See Sections 1.4.1 and 4.2.
- Alternative development was initiated with a series of Interdisciplinary (ID) Team meetings. Resource and resource use staff from the Billings, Butte, Dillon, Lewistown, Great Falls, Malta, Miles City, Missoula, North Dakota, and South Dakota BLM Field Offices participated in these meetings.
- The ID Teams fully developed two alternatives (including the No Action) to consider in response to the goals identified in Section 1.3, within the constraints imposed by existing policy and guidance.

After the EA was released for public comment in August 2001, several changes to the alternatives were made, including:

- Preferred Alternative: One Fire Management Zone category was changed in response to public comment.
- Preferred Alternative: Specific RMP amendments to improve BLM’s ability to implement the National Fire Plan and Federal Fire Policy were identified.
- Both Alternatives: Broad levels of treatment and guidelines for fire management to protect other resources were identified.

2.3 Alternative Design, Evaluation, and Selection Criteria

The following goals and objectives guided development of the alternatives. Key elements of the Federal Fire Policy are also summarized. Alternatives were developed to satisfy these goals, objectives and policy statements.

In some cases, the wildland fire itself may create conditions that would compromise these goals and objectives. Also, human life and safety would be prioritized above the achievement of any of these goals/objectives.

Goals related to fire and fuels management

- *Fire:* protect human life and property, reduce the risk and cost of severe wildland fire, sustain ecological health and function of fire-adapted ecosystems, minimize adverse effects of wildland fire suppression, and use fuels management methods to reduce hazardous fuels while meeting other resource objectives
- *Fish and Wildlife, including Special Status Species (Federally Threatened, Endangered, Proposed, and Candidate Species, BLM Sensitive Species and State Species of Concern):* protect, maintain, preserve, and/or restore habitats necessary for the conservation of species, and the ecosystems upon which they depend, to maintain viable and diverse populations of native plant, animal, and aquatic species including special status species
- *Vegetation:* improve ecosystem health and maintain or restore the range of ecological conditions in which native aquatic, vegetative, terrestrial and special status species evolved
- *Cultural, Paleontological:* protect high value cultural and paleontological resources

- *Designated Special Areas*: protect the characteristics that warranted designation of Areas of Critical Environmental Concern (ACECs), Wild and Scenic River corridors, Outstanding Natural Areas (ONAs), Special Recreation Management Areas (SRMAs), historic sites, Wilderness Areas, and Wilderness Study Areas (WSAs)
- *Recreation*: protect developed recreation facilities

Natural and biological resource objectives:

Fire and fuels management related actions will:

- *Air*: meet federal and state air quality standards and comply with the Montana/Idaho Airshed Group Operating Guide.
- *Fish and Wildlife*:
 - Threatened and Endangered Species: Ensure that BLM actions will not reduce the likelihood of survival or recovery of any listed species or destroy or adversely modify designated critical habitat.
- *Water*: meet federal and state water quality standards and prevent degradation.
- *Visual*: meet established Visual Resource Management (VRM) class objectives.
- *Uplands, Riparian Areas, Wetlands, Water, Air, Native Plant and Animal Species, Threatened, Endangered, and Candidate Species*: meet Standards for Rangeland Health.

Resource use objectives:

Fire and fuels management related actions will:

- *Vegetation*: reduce the amount of forest, shrub, and grass lands that are characterized as condition class 2 and 3 (where fire regimes have been moderately to significantly altered from their historical ranges, where there is a moderate to high risk of losing key ecosystem components, where fire return frequencies have departed from historical frequencies by more than one return interval, and where vegetation attributes have been significantly altered from their historical range.)
- *Special designations objectives*: Fire and fuels management actions will:
 - Wilderness/Wilderness Study Areas: meet the wilderness non-impairment mandate and avoid unnecessary impairment of suitability for preservation as wilderness (Wilderness Study Areas (WSAs)).

2.4 Alternatives Considered but Eliminated from Detailed Study

2.4.1 Prescribed Fire Alternative

The BLM considered its ability to achieve fuels reduction solely through the use of prescribed fire on public lands throughout Montana and the Dakotas. Field Office and fire management personnel indicated that prescribed fire would pose a very real danger in some areas where vegetation is far beyond its natural fire cycle, without some form of pre-treatment. In conjunction with the amount of private property in and around these areas, this fuels accumulation creates an unacceptable risk to human life and resources. This would also be inconsistent with agency guidance regarding the Federal Wildland Fire Management Policy (IM-2002-034).

2.4.2 Re-categorization of Wilderness Study Areas (WSAs)

In response to public comment, BLM re-evaluated WSA polygon categorizations to determine whether more natural ignitions could be allowed to burn in wildland areas. Field Office staff re-evaluated the categorizations, and changed the category of one fire management zone (Pryor Mountains) from a B to a C category area. This fire management zone contains three WSAs (Burnt Timber Canyon, Pryor Mountain, and Big Horn Tack On). Since the changes were made to only one polygon, the changes were incorporated into the preferred alternative rather than becoming a separate alternative. Other WSA category designations could not be changed at this time because the WSAs exhibit characteristics such as those listed below:

- Small size
- Moderate to heavy fuel loads that would not allow natural ignitions to burn safely
- Adjacent to land with other ownerships
- High potential for fires to cause undesired impacts to other resources and values

2.4.3 Treatment of all BLM-administered Lands in Condition Class 2 and 3 in Montana and the Dakotas

While 1.3 million BLM-administered acres are currently classified as being in Condition Class 2 or 3 (where the frequency of fire regimes have been moderately or significantly altered) in Montana and the Dakotas, it was not considered feasible to treat all these acres within the next 10 years. Current (and likely) future funding, planning, and staffing levels could not support this level of treatment. Further, treating some acres of Condition Class 2 and 3 may cause serious resource management conflicts and conflict with other RMP decisions. This approach would not allow for the efficacy of fuels treatments and the impacts on

resources to be evaluated periodically as individual projects are completed. See the glossary for a definition of Condition Class 2 and 3.

2.5 Description of the Alternatives

This section describes the similarities and differences between the alternatives. A key difference between the alternatives is whether land use plans include the decisions necessary to implement the 2001 Federal Fire Policy and the National Fire Plan. These decisions are judged “necessary” because they have appeared in recent BLM planning handbook guidance, or because they have been identified as necessary by BLM resource and fire specialists.

Section 2.5.1 includes management elements common to both alternatives; this section allows the differences of each alternative to be clearly defined in sections 2.5.2 and 2.5.3.

2.5.1 Management Common to All Alternatives

This section refers back to section 1.6, Applicable Legal Regulatory Restraints and Coordination. BLM would comply with the laws, regulations, acts, Executive Orders, policy, and formally adopted agreements described in section 1.6 under both alternatives.

This section also includes protection measures (based on current policy, guidance, direction, acts, and laws—section 2.5.1.1); and describes the nature of the fuels treatments that would be completed under both alternatives (section 2.5.1.2).

2.5.1.1 Protection measures common to both alternatives

These protection measures are based on existing policy, direction, law, and regulation. They are described here to emphasize the portions of policy that are relevant to this proposed action.

- **Air Quality:** Prescribed fire will conform with the provisions of state regulations and implementation plans as specified in BLM manual section 9210-Fire Planning and (in Montana) the Montana Airshed Group Operating Guide.
- **Chemical Use:** Label directions, BLM Manual 9011, and H9011-1 Chemical Pest Control Guidance will guide the use of chemicals on individual projects.
- **Cultural:** Prior to implementing fire projects, the BLM will do an appropriate level of Native American consultation according to the guidance in BLM Manual 8160 and Handbook H-8160-1 to identify potential religious or cultural concerns.

- **Cultural:** If Native American human remains are discovered on public lands during fire suppression, rehabilitation, or fuels reduction activities, the BLM will follow procedures identified in the Native American Graves Protection and Repatriation Act (NAGPRA) and 43 CFR part 10. If BLM fire suppression or reclamation activities extend onto private or state land, and burials are discovered, the provisions of the appropriate state burial law will be followed.
- **Cultural:** The protective measures that guide the placement of dozer lines and other surface disturbing fire-related activities will be followed unless the authorized officer determines that due to adverse fire behavior, implementation of a particular measure is not feasible and prudent. In those cases, the measure may be waived or modified to address crucial safety issues, i.e., imminent threats to life and/or property. The SHPO will be notified if such measures are waived or modified in accordance with existing agreements or 36 CFR 800. Also, unless critical safety issues prevent a cultural resource inventory from being conducted, the provisions regarding post-fire cultural resource inventory cannot be waived or modified. If inventory is waived or modified by the authorized officer the SHPO will be consulted consistent with existing agreements or 36 CFR 800.
- **Special Status Species (SSS):** Under BLM Special Status Species policy (BLM Manual 6840), BLM shall ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for listing a candidate or BLM sensitive species under the Endangered Species Act.
- **Threatened and Endangered Species:** Areas of occupied and/or suitable habitat, important for species expansion and recovery, would be protected from adverse effects resulting from fire/fuels management related activities.
- **Wilderness and Wilderness Study Areas (WSAs):** Activities in wilderness areas and WSAs, including all fuels management activities, must not impair wilderness values. Inclusion of a WSA in a polygon does not automatically enable all types of treatments and prescribed burning associated with the category to be completed within the WSA. Treatment will not impair, and will in fact enhance, wilderness values. Minimum Tool and Minimum Requirement concepts must be reviewed.
- **Visual:** In order to ensure that the objectives of each visual resource management class is met, contrast ratings are required for all major projects (prescribed burning, mechanical and chemical pre-treatments) on public lands that fall within VRM Classes I and II, and

Class III areas which have high sensitivity levels. Actions must not exceed the VRM objectives established for the management class.

2.5.2 Alternative A (No Action Alternative)

The No Action Alternative is for BLM to continue to implement current wildland fire suppression policy and to implement fuels management actions through project plans that are largely consistent with existing RMPs. Some fuels management actions would continue to be constrained by the Powder River and Big Dry RMPs.

The BLM would also implement the *National Fire Plan (NFP)* and *Federal Wildland Fire Management Policy (2001 Federal Fire Policy)* to the fullest extent possible.

However, implementation of the NFP and 2001 Federal Fire Policy would be restricted by existing RMP decisions where:

- RMP decisions do not allow specific actions associated with fire and fuels management (e.g., some methods for mechanically treating hazardous fuels), or
- RMP decisions allow necessary activities but do not provide sufficient direction to guide fire and fuels management (e.g., have not applied fire management categories).

See Table 1 for a summary of current RMP decisions related to fire and fuels management. Under the No Action Alternative, these decisions would continue to guide, and in some cases limit, fire suppression and fuels management on BLM-administered public lands.

2.5.3 Alternative B (Proposed Action)

Under the proposed action, BLM would amend all RMPs covering BLM-administered lands in Montana and North and South Dakota, to include the following new decisions recommended in BLM planning guidance (Handbook H-1601-1) for fire management:

1. Fire management categorization: Four consistent fire management category descriptions are included in H-1601-1. Selecting one of these designations provides broad fire and fuels management direction based on ecological, social, economic, and political considerations. The guidance provided by categorization would be applied to all BLM-

administered public lands within the boundaries of designated fire management zones. This guidance would not apply to private, state, or federal lands administered by another agency that also happen to fall within the boundaries.

See Table 2 for a description of the management associated with each category. See Table 3 for the name, categorization, and acreage of each of these fire management zones associated with this alternative. See Appendix A, Maps 3-10 for the fire management zone boundaries and categories for each Field Office.

2. Broad Levels of Treatment: Broad levels of treatment are considered as a basis for analysis. Fuels treatments would include prescribed burns and mechanical (including manual) methods. Chemical weed treatments are also anticipated. Total acres by treatment type and category are listed in Table 2, and are further qualified by vegetation type in Chapter 3 for the purpose of analysis.
3. General guidance for fire management (including both wildfire suppression and fuels management) needed to protect other resource values: This guidance provides additional protection for resources sensitive to an expanded level of treatment where existing policy does not provide sufficient protection. See section 2.5.3.1 for mandatory measures and Appendix B for available design features for wildlife.

BLM would also revise the following existing decisions in individual RMPs, based on recommendations from BLM specialists:

- The Powder River RMP would be amended to allow prescribed fire to be used on more than 20 acres per year.
- The Big Dry RMP would be amended to allow commercial timber harvest as a mechanical treatment method in the Big Dry planning area.
- Decisions in the JVP, West HiLine, and Billings RMP would be qualified so that any timber harvested for the purpose of fuel reduction would not count toward established Allowable Sale Quantities (ASQs) or annual cuts for those areas.

See Appendix C for the text of the proposed amendments.

Table 1 - Summary of Current Fire Management Guidance (No Action Alternative)

| Wildland Fire Suppression Guidance | Current Prescribed Fire/Fuels Reduction Guidance |
|--|--|
| <p>Control, during first burn period, all wildfires on or threatening public land.</p> <ul style="list-style-type: none"> • North Dakota RMP (67,571 acres). • Headwaters RMP (311,337 surface acres; includes a portion of Lewistown FO): modified suppression recognized. • Powder River RMP (1,080,675 acres): modified suppression recognized. Protection priority goes to highest-value resources. <p>All wildfires receive initial attack unless a modified suppression plan is developed and in effect:</p> <ul style="list-style-type: none"> • West HiLine RMP (626,098 acres) Also establishes criteria for identifying limited suppression areas. • South Dakota RMP (280,672 acres). No fires are allowed to burn unless covered by an approved prescribed burn plan or modified suppression plan. <p>Intensive and Conditional Suppression, by Area:</p> <p>Fires will be intensively suppressed in areas with high resource value, structures, improvements, developments, commercial forest values, sagebrush and juniper areas, fire sensitive woody riparian areas, and cultural areas. Conditional suppression will be applied to areas with resources low in value or not warranting initial action/ high costs:</p> <ul style="list-style-type: none"> • Judith RMP (867,591 acres) and Phillips RMP (1,084,960 acres): Allowable burn acreages established. • Valley RMP (1,134,644 acres). • Big Dry RMP (1,703,830 acres): Intensive areas require immediate suppression. Varying response in conditional areas. Requires rehabilitation plans if more than 25 acres burn. <p>Respond to all fires on or threatening public lands:</p> <ul style="list-style-type: none"> • Billings RMP (431,676 surface acres). <p>Use a modified suppression plan for wilderness areas, primitive areas, and selected areas. Control and confinement areas identified.</p> <ul style="list-style-type: none"> • Dillon MFP (902,528 acres). <p>Develop a Fire Management Plan to identify areas for the appropriate actions of control or confinement.</p> <ul style="list-style-type: none"> • Garnet RMP (145,660 acres). | <p>Prescribed Burning</p> <p>Prescribed burning is currently allowed on 8.2 million acres, with:</p> <p>No limitations</p> <ul style="list-style-type: none"> • Headwaters RMP, Dillon Management Framework Plan (MFP), North Dakota RMP, and South Dakota RMP. <p>Annual acreage limitation</p> <ul style="list-style-type: none"> • Within the Powder River planning area, prescribed burning may be used on about 20 acres per year. <p>Prescribed Burning Restrictions in WSAs</p> <p>Prescribed fire will not be used in WSAs in the Judith-Valley-Phillips planning area. Other RMPs do not mention whether prescribed fire is allowed in WSAs. Existing policy, however, does provide guidance on limited situations when the use of prescribed fire could be considered in WSAs. (This analysis does not consider new RMP decisions for expanded use of prescribed fires in WSAs).</p> <p>Prescribed Burning Restrictions on Certain Landcover Types:</p> <p>Garnet RMP: Prescribed fire is not allowed on 5,820 acres adjacent to stream channels and recreation sites. (This analysis does not consider expanded use of fire in these areas).</p> <p>Other Management Limitations</p> <p>Six plans do not limit prescribed burning but do limit timber management options, which affect BLM's ability to effectively implement mechanical hazardous fuels reduction projects under the National Fire Plan and 2001 Federal Fire Policy.</p> <ul style="list-style-type: none"> • Big Dry RMP: No sale of sawtimber except salvage harvest ponderosa pine. Wood product sales are only allowed in Knowlton, Pine Unit, and Missouri Breaks areas. Mechanical treatments are limited to 15 percent or less slopes. • Billings RMP: Annual cut limited to 70 thousand board feet (MBF) per year over a 10-year period. • Judith-Valley-Phillips (JVP) RMP: Allowable Sale Quantity (ASQ) of forest products limited to 650 MBF per year over a 10-year period. • West HiLine RMP: ASQ of forest products limited to 300 MBF per year over a 10-year period. |

Table 2 Comparison of Fire Management Categories (H-1601-1 Land Use Planning Handbook and IM no. 2002-034)

| Category A: Fire is not desired at all (38,000 acres) | Category B: Unplanned fire is likely to cause negative effects (5.81 million acres) | Category C: Fire is desired to manage ecosystems, but current vegetative condition creates constraints on use (2.52 million acres) | Category D: Fire is desired; no constraints on its use (27,000 acres) |
|---|--|---|---|
| <p><i>Fire Management Activities</i></p> <ul style="list-style-type: none"> • Mitigation and suppression required • Fire should not be used to manage fuels | <p><i>Fire Management Activities</i></p> <ul style="list-style-type: none"> • Suppression required • Fire and non-fire fuels treatments may be used | <p><i>Fire Management Activities:</i></p> <ul style="list-style-type: none"> • Suppression may be required • Fire and non-fire fuels treatments may be used | <p><i>Fire Management Activities:</i></p> <ul style="list-style-type: none"> • Suppression may not be necessary • Both fire and non-fire treatments could be used |
| <p><i>Rationale for Categorization:</i></p> <ul style="list-style-type: none"> • Direct threats to life or property • Ecosystems not fire dependant • Long fire return intervals | <p><i>Rationale for Categorization:</i></p> <ul style="list-style-type: none"> • Unplanned ignitions would have negative effects on ecosystems unless mitigated | <p><i>Rationale for Categorization:</i></p> <ul style="list-style-type: none"> • Significant ecological, social, or political constraints | <p><i>Rationale for Categorization:</i></p> <ul style="list-style-type: none"> • Few ecological, social, or political constraints • Less need for fuels treatment |
| <p><i>Fire Suppression Considerations:</i></p> <ul style="list-style-type: none"> • Emphasis on prevention, detection, and rapid suppression response and techniques | <p><i>Fire Suppression Considerations:</i></p> <ul style="list-style-type: none"> • Emphasis on prevention/education and suppression | <p><i>Fire Suppression/Use Considerations:</i></p> <ul style="list-style-type: none"> • Emphasis on reducing unwanted ignitions, resource threats, and fuels accumulations | <p><i>Fire Suppression/Use Considerations:</i></p> <ul style="list-style-type: none"> • Emphasis on using planned and unplanned wildfire to achieve resource objectives |
| Multiple Fire Priority: ¹ Highest | Multiple Fire Priority: ¹ High | Multiple Fire Priority: ¹ Medium | Multiple Fire Priority: ¹ Lowest |
| <p><i>Anticipated type and level of fire/fuels treatments:</i></p> <ul style="list-style-type: none"> • <1,000 acres mechanical | <p><i>Anticipated type and level of fire/fuels treatments, including treating areas that were previously treated:</i></p> <ul style="list-style-type: none"> • 105,000 acres prescribed fire • 74,000 acres mechanical • 37,000 acres chemical weed treatment | <p><i>Anticipated type and level of fire/fuels treatments, including treating areas that were previously treated:</i></p> <ul style="list-style-type: none"> • 192,000 acres prescribed fire • 84,000 acres mechanical • 149,000 acres chemical weed treatment | <p><i>Anticipated type and level of fire/fuels treatments:</i></p> <ul style="list-style-type: none"> • 2,000 acres fire use or prescribed fire |

¹ If multiple fires were burning, Categories A and B would generally receive priority for fire management resources.

Table 3 Montana/Dakotas Fire Management Zones¹

| Field Office | Fire Management Zone | Category | Size (acres) (approximate) | BLM acres (approximate) |
|------------------------------|---|----------------|-------------------------------|----------------------------|
| Billings (see Map 3) | 1. Billings Grasslands | B | 9,025,800 | 263,500 |
| | 2. Roundup | B | 853,000 | 86,700 |
| | 3. Pryor Mountains | C | 138,600 | 50,100 |
| | 4. Big Timber/Absaroka | B | 768,200 | 11,500 |
| | 5. Twin Coulee WSA | B | 12,700 | 7,100 |
| | 6. Pompey's Pillar | B | 500 | 500 |
| Butte (see Map 4) | 1. Absaroka Foothills | C | 67,700 | 3,900 |
| | 2. Big Belt Mountains | C | 360,300 | 7,200 |
| | 3. Big Hole River Corridor | C | 68,800 | 11,100 |
| | 4. Blackfoot (See Missoula FO) | C | 340,800 | 0 |
| | 5. Boulder River | B | 264,400 | 14,300 |
| | 6. Clancy/Marysville | C | 299,600 | 28,200 |
| | 7. Elkhorn Mountains | C | 482,900 | 68,900 |
| | 8. Fleecer Mountains | C | 284,300 | 18,100 |
| | 9. McCartney/Rochester | C | 273,600 | 28,100 |
| | 10. North Hills | B | 33,900 | 6,300 |
| | 11. Pipestone | C | 369,300 | 41,000 |
| | 12. Scratchgravel Hills | B | 126,900 | 7,900 |
| | 13. Sleeping Giant/Sheep Creek | C | 82,600 | 20,500 |
| | 14. Spokane Hills and North | B | 156,500 | 6,800 |
| | 15. Three Forks | C | 485,000 | 31,200 |
| | 16. Wise River Townsite | B | 10,100 | 1,400 |
| | 17. Bozeman/Livingston Scattered Tracts | A | 1,714,300 | 7,300 |
| Dillon (see Map 5) | 1. Beaverhead Mountains | B ² | 743,300 | 27,100 |
| | 2. Beaverhead/Jefferson | A ² | 556,400 | 14,900 |
| | 3. Big Hole River Corridor | C ² | 68,800 | 6,900 |
| | 4. Big Sheep/Medicine Lodge Backcountry Byway | B ² | 96,100 | 46,500 |
| | 5. Blacktail Mountains | C ² | 34,600 | 21,400 |
| | 6. Blacktail/Horse Prairie | C ² | 593,300 | 236,100 |
| | 7. Centennial | C ² | 505,800 | 131,800 |
| | 8. East Madison | C ² | 320,600 | 9,800 |
| | 9. Gravelly Mountains | C ² | 556,600 | 34,300 |
| | 10. Madison Valley | A ² | 410,200 | 23,300 |
| | 11. McCartney/Rochester | C ² | 273,600 | 89,600 |
| | 12. North Rubys | D ² | 26,800 | 13,700 |
| | 13. SE Foothills/Pioneers | C ² | 969,100 | 91,500 |
| | 14. Sweetwater/Ruby | C ² | 295,300 | 81,500 |
| | 15. Tendoy Mountains | C ² | 131,700 | 52,500 |
| | 16. Tobacco Root Mountains | C ² | 289,900 | 29,300 |
| Lewistown (see Map 6) | 1. Timber/Mountain Range | B | 262,200 | 37,900 |
| | 2. Range/Grasslands | B | 19,401,800 | 707,800 |
| | 3. Breaks | C | 1,463,700 | 670,400 |
| | 4. Front Range | C | 82,800 | 14,600 |
| Malta (see Map 7) | 1. Timber/Mountain Range | B | 65,200 | 30,100 |
| | 2. Range/Grasslands | B | 4,913,700 | 1,853,800 |
| | 3. Breaks | C | 376,300 | 247,700 |
| Miles City (see Map 8) | 1. Cedar Breaks | B | 122,000 | 60,400 |
| | 2. Vicinity of Custer National Forest | C | 1,804,500 | 136,100 |
| | 3. Knowlton-Locate | C | 36,200 | 11,700 |
| | 4. Missouri-Musselshell River Breaks | C | 483,000 | 178,900 |
| | 5. Mixed Grass Prairie Sagebrush | B | 23,020,300 | 2,240,300 |
| | 6. Rural Interface | B | 232,700 | 30,400 |
| | 7. Special Management Areas | C | 95,000 | 94,200 |
| Missoula (see Map 9) | 1. Blackfoot | C | 357,000 | 71,100 |
| | 2. Clark Fork Front | B | 223,600 | 15,900 |
| | 3. Flintrock | B | 529,300 | 21,500 |
| | 4. Hoodoo | C | 389,400 | 31,600 |
| North Dakota | 1. North Dakota Resource Area | B | — | 59,600 |
| South Dakota (see Map 10) | 2. Exemption Area | B | 22,400 | 5,400 |
| | 3. Fort Meade Recreation Area ACEC | B | 6,700 | 6,500 |
| | 4. Remainder of South Dakota Field Office | B | — | 263,900 |

¹ Category and associated treatments only apply to BLM land within each zone

² Likely categories within the Dillon Field Office. Final category decisions will be made in the Dillon RMP/EIS

2.5.3.1 Direction for fire management (including both fire suppression and fuels management) to protect other resource values

The following direction would be used when developing and updating field office fire management plans, when responding to wildland fires, and when developing site-specific fuels projects. This direction would not be mandatory during wildland fire suppression if using it would compromise protection of life or property.

Aquatic Species (including Special Status Species) and Habitat Fuels Management

- To provide additional protection of aquatic species beyond Streamside Management Zone (SMZ) boundaries, **Riparian Protection Zones (RPZs)** would be identified to protect the following specific key ecological functions:
 - **water quality**, to a degree that provides for stable and productive riparian and aquatic ecosystems;
 - **stream channel integrity**, channel processes, and the sediment regime (including the elements of timing, volume, and character of sediment input and transport) under which the riparian and aquatic ecosystems developed;
 - **instream flows** to support healthy riparian and aquatic habitats, the stability and effective function of stream channels, and the ability to route flood discharges;
 - **natural timing and variability** of the water table elevation in meadows and wetlands.
 - **diversity and productivity** of native and desired non-native plant communities in riparian zones.
- The width necessary to protect stream and riparian area structure and function should be determined from watershed and site-specific analysis. Interim RPZ boundaries described below should be considered default boundaries until final boundaries are determined by watershed or site-specific analysis. Final RPZ boundaries may be narrower or wider, depending on local conditions and results of the project specific analysis.
- Interim RPZ boundaries within forested zones would be:
 - Streams, ponds, lakes containing Special Status Fish Species: two site-potential tree heights
 - Other fish-bearing streams: one site-potential tree height
 - Ponds, lakes, and wetlands greater than 1 acre: the RPZ consists of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or to a distance equal to one site-potential tree height (whichever is greatest)
- Interim RPZ boundaries for non-forested rangeland ecosystems would consist of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or (in segments where trees are present) to a distance equal to one site-potential tree height (whichever is greatest).
- Fuels treatments could occur within these RPZs; however, riparian values would receive primary management emphasis during fuels treatments.
- All proposed fuels treatments within RPZs should analyze particular risk from wildfire and fuels management projects to isolated, depressed populations in degraded habitats without access to local or regional refugia. Proposed treatments should incorporate specific design features to avoid any further degradation of habitat.
- If RPZ boundaries are narrower than SMZ boundaries, fuels treatments would still comply with applicable state laws and Water Quality/Forestry Best Management Practices that BLM has adopted.
- See Appendix D for more complete development of the RPZ strategy.
- The following **conservation measures** would be applied to protect Threatened and Endangered fishes:
 - Pallid Sturgeon (Endangered)
 - No aerial retardant should be applied within 300 feet of the Yellowstone River below the mouth of the Powder River or within 300 feet of the Upper Missouri River (above Fort Peck Dam).
 - Restrict livestock grazing of riparian vegetation, especially cottonwood stands along the Upper Missouri River (above Fort Peck Dam), and Yellowstone River below the mouth of the Powder River, where that vegetation has been recently affected by fire or other catastrophic events (blowdown, ice shear, flood etc.) until successful regeneration of vegetative components occurs.
 - Bull Trout (Threatened)
 - Projects shall be designed using the guidance set forth in the "Interim Bull Trout Habitat Conservation Strategy."
 - BLM would comply with the Terms and Conditions in the Biological Opinion from FWS.

Cultural and Paleontological Guidance

Fire Suppression

- The following guidance is recommended for the protection of cultural and paleontological resources during fire suppression, stabilization, and restoration activities. These guidelines should be incorporated into Montana's existing Protocol in consultation with the MT SHPO. The ND Field Office and the SD Field Office should consult with their respective SHPOs on implementation of these recommended guidelines. A Programmatic Agreement may be the appropriate instrument for their implementation:
 - Fire suppression tactics would limit surface disturbance to protect cultural resource values in designated cultural Areas of Critical Environmental Concern (ACEC), archeological districts, and other areas known or suspected to contain cultural resources, including historic structures and features. Use of earth moving/tillage equipment should be avoided for wildland fire suppression in areas with special designations to protect cultural resources and values, archeological districts, and other areas known to possess cultural resources. The use of heavy equipment and off-road vehicles should be limited to existing roads and trails within these areas during rehabilitation.
 - The aerial application of fire retardant would be restricted over areas that contain petroglyphs and pictographs.
 - Fire camps and fire staging areas should be placed outside and sufficiently distant from known or identified cultural resources. Use of off-road motorized vehicles outside of fire camp and staging areas should be avoided to prevent inadvertent impacts to cultural resources.
 - An intensive cultural resource inventory (Class III) as described in BLM Manual 8110 should be completed on areas disturbed by suppression activities, e.g., fire lines, fire camp areas, and staging areas before starting rehabilitation. Cultural resources discovered in or near disturbed areas should be protected from further damage during rehabilitation. Where cultural resources have been disturbed by suppression activities stabilization work may be implemented. This may entail a careful return of the berm over the site, seeding, or covering the site with protective mesh and culturally sterile material. These emergency actions should be considered on a case-by-case basis at the discretion of the archaeologist assigned to the fire. Consultation with the SHPO would be done in accordance with existing agreements or 36 CFR 800.
- A BLM resource advisor would be on site during suppression and rehabilitation activities. A qualified archeologist (BLM, federal, or consulting archeologist) will be requested to give guidance and ensure compliance with the guidelines and decisions established to protect cultural resource values. Cultural resource input and involvement by the archeologist should be at the initiation of the fire emergency and throughout the process of suppression, stabilization, and restoration activities.
- The archaeologist assigned to the fire would work with the rehabilitation team to ensure that cultural resources, including historic structures and features, are considered during fire suppression restoration actions. Site treatment plans would be prepared for historic properties that have been damaged by fire suppression and require more detailed stabilization efforts. These treatment plans would protect the site from secondary effects of the fire and fire suppression activities.
- Monitoring of sensitive site areas would be conducted when fire suppression rehabilitation plans are within close proximity to historic properties, or could have an indirect effect on an existing resource.
- If stabilization/protective measures were employed for cultural resources a report summarizing those actions should be submitted to an appropriate SHPO. The report should include a description of the fire impacts, fire suppression and rehabilitation, and salvage activities. It should also include the number and types of sites affected and stabilized. In Montana, BLM would provide a summary of activities performed as part of the annual report instead of immediate notification of fire emergency related activities.
- In accordance with the existing agreements or 36 CFR 800, the SHPO would be notified of a fire emergency and the suppression efforts associated with the emergency. Adjustments to these procedures may be made in response to comments from consulting parties; e.g. the SHPO, either programmatically through existing agreements or on a case-by-case basis where no agreement exists.
- Surface disturbance should be limited within designated ACECs and formations known to contain significant fossil resources to protect paleontological values. In these areas with designated paleontological resources, the use of heavy equipment and off-road vehicles would be limited to existing roads and trails during rehabilitation.

- Fire camps and fire staging areas should be placed outside and sufficiently distant from known or identified fossil localities. Use of motorized vehicles outside of fire camp and staging areas in known fossil producing formations should be avoided to prevent inadvertent impacts to fossil resources.
- Significant fossils that are exposed by suppression activities or would be damaged by rehabilitation work should be recovered by a qualified Paleontologist.

Cultural and Paleontological Guidance

Fuels Management

- Develop protocol with ND and SD SHPOs similar to that described in IM MT No. 99-032 for Montana. This would allow for a sample inventory instead of a Class III intensive survey of an entire target area. Until that protocol is developed, prescribed fire projects in ND or SD would require consultation with the appropriate SHPOs to develop a prescribed fire survey and protection strategy. The inventory strategies developed for these two states should be similar to guidance provided in IM no. MT-99-032.
- If a class III inventory is used instead of the sample inventory described in IM No. MT 99-032, no additional consultation with SHPO would be required.
- Where known cultural resources are present or are suspected and the area cannot be avoided, hand tools should be used instead of motorized vehicles or heavy equipment to remove brush and tree cover. Also, where cultural resources are combustible, prescribed fire treatments should not be used. In these cases, hand tools and mechanical removal is the appropriate methods to ensure site protection and reduction of fuel load objectives.
- Where known fossil resources are suspected but unknown and where the area cannot be avoided the following measures would be employed: 1. Conduct an inventory to identify the presence or absence of fossil resources employing a qualified paleontologist, 2. in areas where fossil resources are suspected or have been identified avoid using surface disturbing motorized vehicles, heavy equipment, or hand tools, and 3. advise fire personnel and others to refrain from collecting fossils on public lands.
- An archeologist, and to the extent possible, a paleontologist will be used during fuels treatment planning, to assess the risk of damages and to recommend ways to minimize damage to fossil resources resulting from implementation of fuels treatments.

Terrestrial Wildlife Species (including Special Status Species) and Habitat Direction common to both Wildland Fire Management and Fuels Management

- The following **conservation measures** would be applied to protect Threatened and Endangered terrestrial wildlife species:

Interior Least Tern (Endangered)

- No human disturbance within 1/4 mile of least tern nest site from May 15 to August 15;
- No prescribed burning activities within 1 mile upwind of least tern nest sites.
- No helicopter/aircraft activity or aerial retardant application within 1/2 mile of least tern nest sites between May 15 and August 15;
- No prescribed burning activities within 1 mile upwind of nest sites between May 15 and August 15.

Whooping Crane (Endangered)

- No human disturbance within 1/2 mile of occupied whooping crane habitat or potential habitat where whooping cranes have been identified within the past three years from April 1 to August 31
- No helicopter/aircraft activity or aerial retardant application within _ mile of occupied whooping crane habitat or potential habitat where whooping cranes have been identified within the past three years from April 1 to August 31.

Black-footed Ferret (Endangered)

- No heavy equipment operation off of existing roads within 1/4 mile of prairie dog towns with documented occurrence of black-footed ferret
- No aerial retardant application within 1/4 mile of prairie dog towns with documented occurrence of black-footed ferret
- No surface disturbance (fire line construction) should occur in prairie dog towns with documented occurrence of black-footed ferret.

Gray Wolf (Endangered)

- No human disturbance or associated activities within 1 mile of a den or rendezvous site from April 15 to June 30.

Bald Eagle (Threatened)

- No human disturbance within 1/2 mile of bald eagle nests from February 1 through August 15;
- No human disturbance within 1/4 mile of a winter roost from November 1 through March 1 or, if within 1/4 mile, activity should be restricted to a period of 9 am to 3 pm;
- No helicopter/aircraft activity or aerial retardant application within 1/2 mile of known bald eagle nest sites from January 1 through August 15; or within 1/4 mile of a winter roost from November 1 through March 1;

- No prescribed burning activities within 1 mile upwind of nest sites from January 1 through August 15; or within 1 mile upwind of a winter roost between November 1 and March 1.

Piping Plover (Threatened)

- No human disturbance within 1/4 mile of any occupied nest sites from April 1 to July 31
- No prescribed burning within one mile upwind of any occupied nest sites from April 1 to July 31 ;
- No helicopter/aircraft activity or aerial retardant application within 1/2 mile of piping plover nest sites between April 15 and July 31.

Canada Lynx (Threatened)

- Activities shall not cause a greater than 30 percent temporary loss or 15 percent permanent loss of suitable habitat in a decade. In addition, 10 percent of the Lynx Assessment Unit (LAU) shall remain in denning habitat in patches larger than five acres;
- Processes used to reduce fuel levels, prepare sites for planting or for reintroduction of fire shall preserve the majority of large standing dead trees and large woody debris (denning habitat);
- Precommercial thinning or introduction of fire into lynx habitat shall only occur when the forest stand no longer provides snowshoe hare habitat. This occurs when self-pruning processes have eliminated snowshoe hare cover and forage availability.
- Following disturbance such as blowdown, fire, insects, and disease that could contribute to lynx habitat, do not salvage harvest when the affected area is smaller than 5 acres (exceptions would include areas such as developed campgrounds). Where larger areas are affected, retain a minimum of 10 percent of the affected area per LAU in patches of at least 5 acres;
- Design burn prescriptions to create snowshoe hare habitat (e.g. regeneration of aspen and lodgepole pine);
- Minimize construction of temporary roads, firebreaks, machine lines, etc. on ridges, saddles, or areas that would create permanent travel ways that could facilitate increased access by competitors (e.g. coyote, bobcat);
- Restrict livestock grazing of fire created openings, aspen stands, willow carrs, and other potential lynx habitat until successful regeneration of shrub and tree components occurs.

Grizzly Bear (Threatened)

- Within the Recovery Zone, as defined in the Grizzly Bear Recovery Plan (USFWS 1993), any off-road vehicular travel or vehicular travel on restricted roads shall adhere to access standards/direction as provided in local or regional interagency

agreements, Biological Opinions, or local Land Use Plans;

- All activities requiring overnight stays or establishment of a base camp shall be limited to fewer than 20 individuals and less than 5 days duration within the Recovery Zone (defined in Grizzly Bear Recover Plan (USFWS 1993));
- Firewood collection within the Recovery Zone (defined in Grizzly Bear Recovery Plan (USFWS 1993)) shall be limited to roadside hazard tree removal, road maintenance, or campground maintenance activities;
- Activities within the Recovery Zone (defined in Grizzly Bear Recover Plan (USFWS 1993)) in Riparian, Meadows, and Stream Corridors including restoration and improvement projects must not occur between April 1 and July 1 or must be completed in one day;
- Within the Recovery Zone (defined in Grizzly Bear Recover Plan (USFWS 1993)) projects that would significantly change the vegetative community should not be implemented in huckleberry producing sites;
- In order to minimize the potential for habituation or human conflict, activities within the Recovery Zone (defined in Grizzly Bear Recover Plan (USFWS 1993)) will adhere to Interagency Grizzly Bear Guidelines or local interagency grizzly bear standards for sanitation measures or storage of potential attractants;
- Within the Recovery Zone (defined in Grizzly Bear Recover Plan (USFWS 1993)) activities will not involve planting or seeding of highly palatable forage species near roads or facilities used by humans.

Mountain Plover (Proposed)

- No human disturbance within 1/4 mile of occupied mountain plover nest sites from April 1 to July 31;
- No helicopter/aircraft activity or aerial retardant application within 1/2 mile of occupied mountain plover nest sites;
- No prescribed burning within 1 mile upwind of any occupied mountain plover nest sites from April 1 to July 31.
- BLM would adhere to Terms and Conditions as provided in Biological Opinions from the FWS.
- BLM would consider applying conservation and protection measures contained in Conservation Strategies, Recovery Plans, and Biological Opinions, where similar habitats or habitat needs exist elsewhere on BLM- administered lands in Montana/Dakotas.

Vegetation Direction

Wildland Fire Suppression

- The following **conservation measures** would be applied to protect Threatened plant species:

Western Prairie Fringed Orchid, Water Howellia, Ute Ladies'-tresses (Threatened)

- All proposed action areas within potential habitat shall be surveyed by a botanically qualified biologist, botanist, or ecologist to determine the presence/absence of the species;
- No action that would potentially affect the species will be taken within suitable habitat if surveys are not completed to determine the presence or absence of the species;
- Areas of occupied habitat within a proposed project area will have a "site specific" no activity buffer established by a qualified botanist, biologist, or ecologist, to protect occupied habitat;
- Best Management Practices should be applied to protect the area from invasive plant species;
- Non-native species should not be used in revegetation of suitable habitat.
- BLM would comply with the Terms and Conditions in the Biological Opinion from FWS.

Visual Direction

Wildland Fire Suppression

- The use of heavy equipment and retardant for wildland fire suppression should be avoided in designated VRM Class I and Class II areas unless the impact of the fire would more severely impact the VRM values than the impact of equipment and retardant.

- Fire rehabilitation of VRM Class I and II areas should be coordinated with a VRM specialist.

Fuels Management

- Fuels management projects should be coordinated with a VRM specialist.

2.5.3.2 Additional Guidance to protect resource values

- Additional guidance included in Appendix B would be recommended when planning and implementing fire and fuels treatment projects.

2.6 Summary Comparison of Alternatives

Table 4 summarizes the guidance for fire and fuels management that is available under both alternatives, and the new guidance that would become available under the proposed alternative.

2.7 Identification of the Preferred Alternative

Alternative B is BLM's Preferred Alternative.

Table 4 Summary Comparison of Fire/Fuels Management Alternatives

| Alternative A (No Action-Current Land Use Plan Direction) | Alternative B (Proposed fire/fuels management/ Plan Amendments) |
|---|---|
| <p>Current Sources for fire and fuels Management direction and guidance:</p> <ul style="list-style-type: none"> • National Policy (e.g., National Fire Plan, 2001 Federal Fire Policy) • Departmental, Bureau, and program guidance • BLM land use plans (RMP decisions) <p>Protection measures based on current laws, regulation, and policy (see section 2.5.1)</p> <p>Priorities for treatment:</p> <ol style="list-style-type: none"> 1. Protect human life and property (e.g. interface), 2. Reduce the risk and cost of severe wildland fires (e.g. hazardous fuels reduction), 3. Sustain the ecological health and function of the ecosystem (e.g. restore degraded fish/wildlife habitat) | |
| <p>Categorization of BLM lands would not guide fire management. Additional fire management direction would not be provided.</p> | <p>Categorization of BLM lands would guide fire management:</p> <ul style="list-style-type: none"> • Category A: Fire is not desired (38,000 acres) • Category B: Unplanned fire would cause negative effects (5.81 million acres) • Category C: Fire is desired to manage ecosystems, but current vegetative condition creates constraints on use (2.52 million acres) • Category D: Fire is desired; few or no constraints on its use (27,000 acres) |
| <p>Anticipated level of treatment per decade:</p> <ul style="list-style-type: none"> • 158,000 acres prescribed fire • 35,000 acres of mechanical treatments • 3,500 acres of chemical weed treatments | <p>Anticipated level of treatment per decade:</p> <ul style="list-style-type: none"> • 299,000 acres of prescribed fire (Category B: 105,000 acres. Category C: 192,000 acres. Category D: 2,000 acres) • 158,000 acres of mechanical treatments (Category A: <1,000 acres. Category B: 74,000 acres. Category C: 84,000 acres) • 185,000 acres of chemical treatment (Category B: >37,000 acres. Category C: >149,000 acres) |
| <p>Additional guidance to protect other resource values would not be provided.</p> | <p>Additional guidance to protect other resource values (see sections 2.5.3.1 and 2.5.3.2) would be provided for:</p> <ul style="list-style-type: none"> • Aquatic species and habitat (including special status species), cultural and paleontological resources, visual resources, and terrestrial wildlife species and habitat |
| <p>Fire and fuels management would be subject to existing RMP decisions</p> <ul style="list-style-type: none"> ü Commercial timber harvest would not occur in the Big Dry RMP area. ü Prescribed fire in the Powder River RMP area would proceed at 20 acres/year. ü Fuels treatments would count toward ASQs and annual cuts in Billings, JVP, and West Hi Line RMPs. | <p>Specific RMP decisions would be amended:</p> <ul style="list-style-type: none"> ü Commercial timber harvest could be used as a fuels management tool in the Big Dry planning area. ü Use of prescribed fire would not be limited to a level of 20 acres per year in the Powder River planning area. ü Fuels treatments would not count toward established ASQ levels or annual cuts in the Billings, Judith-Valley-Phillips (JVP), and West HiLine RMPs. |

Chapter 3.0: Affected Environment and Environmental Consequences

3.1 Introduction

This section describes the resources and values on BLM administered lands in Montana and the Dakotas that could be affected by each alternative, given the analysis assumptions listed below.

Information on the affected environment is summarized from the Final Environmental Impact Statement Vegetation Treatment on BLM lands in 13 Western States (BLM 1991). Much of the detailed information on fire effects on land and vegetation is also summarized from the 1991 Vegetation Treatments EIS.

The 14 resources that are “BLM Critical Elements of the Human Environment” are identified. In some cases, a negative declaration of presence or effect is all that is required for a particular Critical Element in relation to this proposed action.

3.1.1 Analysis Assumptions

3.1.1.1 Priorities for Treatment

Fuels treatments of grasslands, shrublands, and forestlands would be prioritized according to the following order:

1. Treatments to reduce the risk to human life and property;
2. Treatments to reduce the risk and cost of fire suppression in areas of hazardous fuels buildup; and 3) Treatments to achieve other resource objectives.

The top priority for fuels treatment would be areas in Condition Class 2 and 3 in the wildland urban interface (including currently identified and future communities at risk). This does not mean, however, that all priority 1 and 2 projects would be completed before any treatments to achieve other resource objectives.

Condition Class: Condition Classes are described as “a function of the degree of departure from historical fire regimes resulting in alterations of key ecosystem components such as species composition, structural stage, stand age, and canopy closure. One or more of the following activities may have caused this departure: fire exclusion, timber harvesting, grazing, introduction and establishment of exotic species, insects and disease (introduced or native), or other past management activities” (Schmidt et al, 2002).

Condition classes 2 and 3 represent the highest degree of departure from historic fire regimes. The attributes of

Condition Classes 2 and 3 are as follows:

- Fire regimes have been moderately to significantly altered from their historical ranges.
- Moderate to high risk of losing key ecosystem components.
- Fire return frequencies have departed from historical frequencies by more than one, and in some cases multiple, return intervals. This results in dramatic changes to one of more of the following: fire size, frequency, intensity, severity, or landscape patterns.
- Vegetation attributes have been moderately to significantly altered from their historical ranges.

Communities at Risk: Areas with high potential for escaped fire or loss of life or property would be priorities for treatment.

BLM Field Office staff in 1999 completed a survey that indicated that 79 priority communities are within 1/2 mile of BLM lands. The following characteristics identified for these communities are representative of the values that will be considered in determining priority for treatment:

- 17 have high escaped fire potential (brush, ponderosa pine, mixed conifer, steep slopes, south aspect, dense fuels, ladder fuels, history of high fire occurrence) and/or high potential for loss of life or property (narrow dead end roads, steep grades, one-way in/out, no/minimal fire fighting capacity, no fire hydrants, no surface water, no pressure water system, no emergency operations group, no evacuation plan, fire conducive landscape)
- 50 have moderate escaped fire potential (moderate slopes, moderate fuels and ladder fuels, history of some large fires, moderate response time, moderate fire occurrence) and/or moderate potential for loss of life or property (has some characteristics of both high and low potential for loss of life or property).
- 9 have low escaped fire potential (grass, sparse fuels, little slope, north aspect, history of low fire occurrence, low wind exposure, quick response time) and/or low potential for loss of life or property (multiple entrances/exits, well equipped fire department, wide loop roads, fire hydrants, active emergency operations group, evacuation plan in place, fireproof landscape).

Wildland fires have since occurred in or near 6 of the 79 priority communities identified in 1999.

Since 1999 additional communities and wildland urban interface areas have been developed, and additional areas will be developed in the future.

3.1.1.2 Role of the prescribed fire prescription

Use of prescribed fire under both alternatives would include development of a prescribed fire prescription. These prescriptions would be designed with regard to site characteristics and the reproductive characteristics of the plant species present on the site. Fire effects on a particular plant community or species can be controlled through the choice of weather and fuel moisture conditions under which the fire is staged, the time of year when the site is burned, the size of the burned area as it relates to post-fire livestock and wildlife use, and pre- and post-fire site management. Prescribed burns would generally be conducted in spring or fall, when temperatures are cooler and ground and fuels moisture is higher. Given the prescribed fire prescription, the analysis would consider factors such as plant mortality, postfire sprouting, reproduction from seed, effect of season of burning, effects of weather, postfire plant productivity, relationship of fire to animal use, and postfire plant competition (BLM, 1991). Background on each of these relationships is reviewed in Appendix F of the 1991 Vegetation Treatment EIS.

Necessary measures such as artificial reseeding for plant communities in poor condition or dominated by undesirable species (BLM, 1991, p. F-5) are also considered during the prescribed fire planning process.

The development of prescribed fire prescriptions would minimize negative effects on vegetation (and related/dependant resources), as compared to wildland fire. This relationship is analyzed further for particular resources in the sections that follow.

3.1.1.3 Description of Treatments

The National Fire Plan and the 2001 Federal Fire Policy set fire and fuels management expectations for federal agencies. While these expectations include the need to reduce hazardous fuels, none of the treatments listed below would be implemented without site-specific analysis. The following description of treatments identifies different tools and how they would be used in fuels management and resource projects under both alternatives:

a. *Prescribed burns and mechanical treatment in grasslands and shrublands:* The primary objective of treating grasslands and shrublands, with mechanical treatments and/or prescribed fire, would be to remove encroaching conifers. Encroachment is indicated by the

presence of young conifers (e.g., ponderosa pine, Douglas-fir, limber pine, and juniper) progressing from a forest or woodland into grasslands or shrublands. Mechanical treatments would generally be applied to remove these individual conifers within a grassland or shrubland, rather than to manipulate the grasses or shrubs themselves.

Prescribed fire may also be used to meet resource objectives, such as restoring fire-adapted grass and shrublands, or increasing variation of age classes in shrublands. Treatments would be designed to achieve mosaic patterns, which would also reduce the potential of entire stands being destroyed by wildland fire. Most sagebrush treatments would be on mountain big sagebrush or silver sagebrush

b. *Prescribed burning and mechanical treatments in forestlands:* Past management practices, including fire suppression and timber harvest, have created buildups of small-diameter trees in densities beyond what would naturally occur. These small diameter trees create “ladder fuels” that carry fire from the ground into the canopy of the larger overstory trees, where the fire becomes more difficult and dangerous to fight. In some cases, prescribed fire could be used to thin small diameter timber and remove dead and down woody vegetation. However, where prescribed burns would be difficult or impossible to control because of existing fuels buildup, mechanical or manual preparation may be needed to reduce stand densities and allow a controllable prescribed burn. Non-commercial thinning would be used where the trees to be thinned are too small to be of commercial value.

Commercial thinning may be used to reduce density and the potential for crown fire. Overstory density is a concern where crown continuity creates a high potential for wildland fires to become crown fires. Overstory-class trees may also be removed to reduce competition, allowing individual trees to grow larger and acquire fire-resistant characteristics. For the purposes of reducing wildland fuels, commercial timber harvest would be used. The objective of using timber harvest as a fuels management technique is to create conditions such that, in the future, harvest may not be needed—the more open structure could be safely maintained with prescribed fire treatments.

c. *Support activities, including chemical weed treatments for fuels projects:* Chemical weed treatments would be applied where other fuels treatments would create conditions favorable for expansion of noxious weeds or other undesirable invasive species. For example, weeds are often present in areas of conifer encroachment. When the canopy is opened by mechanical treatments or prescribed burns, the

conditions are favorable for the weeds or invasive species to expand. Nearly all of the weed treatments would be applied either before and/or after the areas are treated with prescribed fire or mechanical methods. The anticipated level of activity identified for the alternatives did not include application of chemical treatments for purposes other than control of noxious weeds in association with fuels treatments.

Other support activities may include strategic development of water sources for fire suppression, development of fuel breaks, and construction of access roads for vegetation treatments. These roads would be rehabilitated after use. Some relocation/redesign of existing roads would also be anticipated under both alternatives.

- d. *Fire use:* Until a Fire Management Plan is developed and approved, fire use would not be a viable management option with either alternative. With Alternative B, in order to manage naturally ignited wildland fire to accomplish specific pre-stated resource management objectives, areas must be designated as Category C or D and an approved Fire Management Plan (FMP) must be developed.
- e. *Other treatments (e.g., biological):* Other activities, such as livestock grazing, may also be used to achieve specific fuels management objectives. These treatments would be used to help achieve and maintain healthy, properly functioning ecosystems within the historic and natural range of variability for long-term sustainable use and to comply with standards for rangeland health and guidelines for livestock grazing management. The type and level of biological treatments may be considered to meet specific objectives at the site-specific level, and are not included as part of this detailed analysis.

Treatments would be influenced by RMP decisions and objectives. It should not be inferred that all areas that exhibit conditions listed above (i.e. conifer encroachment) would be treated. Rather, distinct areas would first be identified for treatment based on fire/fuels management objectives, property values at risk, or resource objectives. The project would then be designed using one or more of the treatment methods listed above, and the project would be analyzed within the context of other resource needs and RMP decisions. In general, fuels treatments would focus on improving Condition Class 2 or 3 attributes, and would be refined for the project/watershed level

Table 5 lists broad levels of treatment anticipated over the next 10 years, by the general vegetation type on which anticipated activities would occur under each alternative. These treatment levels are used as a basis for impact analysis.

3.1.1.3 Wildland fires

Past wildland fire history provides a reasonable basis upon which to predict future wildland fire activity.

- Between 1980 and 2001, federal agencies responded to 18,808 wildland fires in Montana and the Dakotas. These fires burned over 3.1 million acres. Maximum fire size was 387,400 acres and the average fire size was 165 acres. Records are not available for those wildland fires to which federal agencies did not respond. Between 1978 and 2000, 782 fires were reported to have started on BLM land.
- As hazardous fuel loads are reduced, the potential for intense, severe wildland fire should also be reduced. Everything else being equal, when a wildland fire does occur in a treated area, the fire should be characterized by:
 - shorter flame length,
 - cooler burns,
 - greater chance of being a surface fire instead of a crown fire, and reduced chance of being a stand replacement fire.
- The fire suppression tactics that are effective in controlling wildland fires depend on, among other things, the amount of fuel and the flame length. From widely held and commonly agreed upon experience, the following are reliable rules (Rothermel 1983):
 - Flame length of less than 4 feet: Fire lines constructed with hand tools, such as shovels and axes, can be effective at the front of the fire. These tactics are often referred to as “light on the land” tactics.
 - Flame lengths of 4 to 8 feet: Fire lines constructed with bulldozers and heavy equipment are needed to be an effective fire line. If bulldozers are not available, fire engines with hoses and water may be required to “knock down” the flames before fire crews with hand tools can be effective. Or fire crews must construct a fireline at a considerable distance from the fire.
 - Flame length of 8 to 11 feet: The use of fire suppressing retardant from airtankers or water from helicopters may be necessary to reduce the fire’s rate of spread before fire lines constructed by crews or bulldozers can be effective.
 - Flame length more than 11 feet: Direct suppression efforts are usually ineffective. Retreating to existing roads, streams, and other barriers is appropriate. Burning out vegetation between the

Table 5 Comparison of Anticipated Activities within 10 years

| Alternative A | Alternative B |
|--|--|
| <ul style="list-style-type: none"> • Most fuels reduction projects would require an integrated strategy in which a combination of prescribed fire, mechanical treatments, and chemical treatments would be applied over a period of years. • Once an area is treated, it would likely require either mechanical or prescribed fire maintenance treatments. Prescribed fire would be more commonly used as the re-treatment method. • If noxious weeds exist on the project area, chemical treatments may be applied before and after each treatment (both maintenance and original treatments) to limit the spread of noxious weeds. | |
| <p>Prescribed fire: 158,000 acres would be treated.¹ Treatments would occur on:</p> <ul style="list-style-type: none"> • 50,000 acres of grass lands (32 percent re-treatment) • 8,000 acres of shrub lands (17 percent re-treatment) • 99,000 acres of forest lands (33 percent re-treatment) • 1,000 acres of agricultural lands (50 percent re-treatment) <p>Mechanical treatments: 35,000 acres would be treated.¹ Treatments would occur on:</p> <ul style="list-style-type: none"> • <200 acres of grass lands • 1,000 acres of shrub lands • 31,000 acres of forest lands (13 percent re-treatment) • 3,000 acres of agricultural lands (16 percent re-treatment) <p>Chemical weed treatments to support fuels treatments: 3,500 acres would be treated.^{1, 2} Treatments would occur on:</p> <ul style="list-style-type: none"> • 500 acres of grass lands • 1,900 acres of shrub lands • 1,100 acres of forest lands <p>Support Activities:</p> <ul style="list-style-type: none"> • 1 mile of new road per decade statewide would be associated with fuels management, which would be rehabilitated after use. | <p>Prescribed fire: 299,000 acres would be treated.¹ Treatments would occur on:</p> <ul style="list-style-type: none"> • 78,000 acres of grass lands (25 percent re-treatment) • 41,000 acres of shrub lands (1 percent re-treatment) • 176,000 acres of forest lands (26 percent re-treatment) • 4,000 acres of agricultural lands (80 percent re-treatment) <p>Mechanical Treatments: 158,000 acres would be treated.¹ Treatments would occur on:</p> <ul style="list-style-type: none"> • 12,000 acres of grass lands • 36,000 acres of shrub lands • 107,000 acres of forest lands (21 percent re-treatment) • 3,000 acres of agricultural lands (16 percent re-treatment) <p>Chemical weed treatments to support fuels treatments: 185,000 acres would be treated.^{1, 2} Treatments would occur on:</p> <ul style="list-style-type: none"> • 46,000 acres of grass lands • 103,000 acres of shrub lands • 36,000 acres of forest lands <p>Support Activities:</p> <ul style="list-style-type: none"> • 3 miles of new road per decade statewide would be associated with fuels management, which would be rehabilitated after use. |

¹Re-treatments may increase after the first decade. Acres treated more than once are double counted.

²When patches of noxious weeds on a portion of an acre are treated, the entire acre is counted for reporting purposes.

fireline and the advancing fire front may be necessary to eliminate wildland fuels.

- The following areas and values would be protected from wildland fire on BLM-administered lands: buildings and structures; oil and gas fields and related facilities; communication sites and related facilities; coal mines and related facilities; rock art, cultural sites, and historic structures; power lines; communities; important wildlife habitat; campgrounds and other developed recreation areas; forested areas where potential loss of key ecosystem components is high; lands having intermingled public, state, and private ownership where there are currently no agreements for using wildfire as a resource management tool; and other areas identified through continued public involvement in fire planning efforts.
- Acres burned and intensity of wild fires would decrease in treated areas as hazardous fuel loads are reduced. Damage to resources and property from wildland fire and fire suppression, as well as cost of suppression, should decrease on and near treated areas.
- With both alternatives, wildland fire trends concerning fire size, intensity, and severity would continue on untreated areas.

3.2 Vegetation

The direct, indirect, and cumulative impacts associated with the alternatives fall into two categories.

The first category of impacts includes the general effects of different vegetation treatment methods, such as the effect of prescribed fire on ponderosa pine. The 1991 Vegetation Treatments EIS (Chapter 3, Section 1) analyzed these impacts separately from any anticipated level of activity or alternative (BLM, 1991). This analysis of general effects is incorporated by reference into this analysis.

The second category of impacts would be based on the anticipated level of activity specific to each alternative. Based on the anticipated levels of activity, the general impacts analyzed in the 1991 Vegetation Treatments EIS are refined into a comparison of the alternatives.

The Montana Land Cover Atlas (University of Montana, 1998) provides a land cover classification system for existing vegetation in Montana. The atlas is a product of the Montana Gap Analysis project (MT-GAP) that provides digital data in geographic information system (GIS). This is used to describe the affected environment and to help assess impacts to vegetation in Montana. A land cover classification system is not available for North or South Dakota. Consequently, assessing impacts by vegetation type in the Dakotas is based on RMP information, analysis of soils maps, and personal observations of resource specialists.

Information about fire effects is summarized from the Northern Rockies Interagency Fire and Aviation Management Fire Effects Information System found at www.fs.fed.us/database/feis/welcome.htm. See Table 6 for a comparative summary of treatments by landcover and the relative amount of BLM land cover that would be treated.

| Table 6 Land Cover and 10 Year Fuels Treatments by Land Cover | | | | | |
|---|----------------------------------|---|---------------------------------|---|---------------------------------|
| Land Cover | Total BLM Acres by cover type | Fuel Treatments (acres) ^{1,2} | Percent Treated of BLM Total | Fuel Treatments (acres) ^{1,3} | Percent Treated of BLM Total |
| | | Alternative A | | Alternative B | |
| Grass lands | 3,790,000 | 50,000 | 1 | 90,000 | 2 |
| Shrub lands | 2,320,000 | 9,000 | <1 | 77,000 | 3 |
| Forestlands | 770,000 | 130,000 | 17 | 283,000 | 37 |
| Other (ag land, barrens) | 1,430,000 | 4,000 | <1 | 7,000 | <1 |
| TOTAL | 8,310,000 | 193,000 | 2 | 457,000 | 5 |

¹ Fuel treatments include mechanical and prescribed burns only. Chemical weed treatments are not included because they mostly occur on areas with other treatments.

² Acres treated more than once are double counted. With Alternative A, it is estimated that between 13 percent and 31 percent of the treatments would occur on acres previously treated.

³ Acres treated more than once are double counted. With Alternative B, it is estimated that between 15 percent and 24 percent of the treatments would occur on acres previously treated.

3.2.1 Grasslands

Affected Environment (Grasslands)

The MT Gap Analysis Project classifies grasslands as areas with more than 15 percent herbaceous cover, less than 15 percent shrub cover, and less than 10 percent forest cover. Grasslands accounted for about 45 percent of the land cover (about 3.79 million acres) on BLM administered lands.

As characterized by the 1991 Vegetation Treatment EIS, grasslands in Montana and the Dakotas can be classified into mountain/plateau grasslands, which occupy relatively higher elevations and are of more limited extent, and plains grasslands, which consist of mixed grass communities and the tall grass prairie. In addition, the sagebrush analysis region has a substantial grass/forb component.

Grasslands occupy a variety of topographical positions, from level areas or valley floors, to alluvial benches and foothills, to steep mountain slopes. Soil characteristics vary accordingly, ranging from deep and loamy, to poorly drained or fairly dry and rocky, or mildly alkaline to mildly acidic (Mueggler and Stewart 1980). The grass component of these communities is usually the most productive, followed by forbs, and then shrubs.

Important grasses in mountain/plateau grass communities include bromes, bluegrasses, sedges, wheatgrasses, fescues, needle grasses, hairgrasses, reedgrasses, bentgrasses, and junegrass. The forb component varies with site, latitude, and management and is diverse throughout the region.

The plains grassland analysis region includes the mixed grass communities of eastern Montana and the Dakotas. Sedges and cool season grasses, such as needlegrasses and wheatgrasses, dominate these communities; other important grasses include needle-and-thread grass, prairie sandreed, junegrass, sand dropseed, buffalograss, side-oats grama, and little bluestem. (Brown 1982, Mueggler and Stewart 1980). Warm season grasses (particularly blue grama) and forbs may also be important components of mixed grass communities.

Tall grass communities in the plains grassland are restricted to certain soil types and areas where grazing history has not been severe (Brown 1985). This type is much more extensive in the true prairie of the Dakotas. Tall grass communities are dominated by big bluestem, little bluestem, Indiangrass, switchgrass, and side-oats grama.

The plains grasslands evolved with grazing by native herbivores, and many of the grasses are well adapted to grazing. Climate is the dominant factor controlling these grasslands, but periodic fire was also an important factor in limiting woody vegetation to mosaics or a savanna situation (Wright et al. 1980). Fire suppression has led to the

establishment of fire disclimax associations of shrubs in some areas (Brown 1982).

Encroachment of conifers (e.g. ponderosa pine, limber pine, and Douglas-fir) indicates that fire regimes in fire-dependent grasslands have been altered, which results in changed ecological conditions.

According to Condition Class spatial data, it is estimated that fire regimes are within an historical range and the risk of losing key ecosystem components is low on about 94 percent of the BLM-administered grasslands (Condition Class 1). Vegetation attributes (species composition and structure) are intact and functioning within an historical range.

The other 6 percent of the BLM-administered grasslands are classified as Condition Class 2 or 3. Section 3.1.1.1 describes characteristics.

Environmental Consequences (Grasslands)

Under either alternative, National Fire Plan and 2001 Federal Fire policy objectives would focus on reducing hazardous fuels and reintroducing fire as a natural process in fire-adapted ecosystems.

Based on the conditions created by fire exclusion in grasslands (i.e. encroachment of conifers), prescribed fire would be the primary tool used to achieve hazardous fuels reduction and function of natural processes in fire-dependent grassland ecosystems. Therefore, the analysis of effects focuses on the impacts associated with prescribed and wildland fires on grasslands. Mechanical treatments of grasslands would also largely be used in combination with prescribed fire to control conifer encroachment.

In general, the effect of fire on grasses depends on the growth form, and how burning influences soil moisture and other environmental and prescribed burning conditions. Many of the grass species are fairly fire resistant and can produce new shoot growth even after moderate to high-severity burns.

Prescribed burns can release understory plants present in sagebrush communities, which may be desirable or undesirable depending on the plant species present. Spring or fall fires are most desirable and effective because the soils are moist and cool, and the burning is more selective. Sprouting shrubs such as bitterbrush, mountain snowberry, and Gambel oak respond favorably, and perennial grasses are benefited. Burning can be used to increase edge effect and increase plant diversity (Bowns 1990).

Large bunch-grasses are more affected than small grasses with coarse stems, and rhizomatous species tolerate fire well (Everett 1987a). Bunchgrass plants that survive a fire can return to pre-burn coverage and production within 2 years

(West and Hassan 1985), but the recovery time may be shorter or much longer, depending on the amount of damage sustained by the plant, its recovery potential, site productivity, postfire weather, and postfire animal use.

The tolerance of forbs to burning depends upon the timing of the fire relative to active plant growth (Wright and Bailey 1982). Those forbs that start growing after the burning season are least affected, because they have the entire growing season to recover from any injury that the fire may have caused. Perennial forbs are usually only slightly damaged by fire, except those mat-forming species such as *Antennaria* spp. (Wright and Bailey 1982, Everett 1987a).

Downy brome (Cheatgrass) may increase after burning (Wright and Bailey 1982) if it is present in the stand or in the area before burning, if few residual native bunchgrass plants remain on the site, or if good post-fire grazing management practices are not followed. If bunchgrass communities are in good condition when the site is treated, Downy brome may persist for only a few years.

Prairie shortgrasses are generally harmed by wild fires during dry years. Buffalograss, annual bluegrass, and western wheatgrass may take three or more years to recover (Wright and Bailey 1982). During years with above normal spring precipitation, these grasses can tolerate fire with no herbage yield reduction following the first growing season (Wright 1974a). Burning usually increases production of switchgrass but decreases little bluestem production where these grasses occur (Wright and Bailey 1982).

Prescribed burn projects would be planned to allow for recovery of key plant species, and typically are scheduled during periods of higher soil and fuel moisture, higher relative humidity, and lower temperature. Native vegetation would be more likely to re-establish naturally (without rehabilitation) following fires under these conditions. Wildland fires typically occur during summer months, when soil and fuel moisture and relative humidity are lower, and temperatures are higher. In general, artificial restoration (rehabilitation) would be necessary more often following wildland fire than following prescribed fire. However, if plant communities are not in good condition prior to prescribed burning, restoration treatments may be necessary to prevent undesirable species such as downy brome (cheatgrass) from taking over the site.

In some cases, short-term reductions in desirable species/uses may be necessary to achieve long-term benefits such as increased plant productivity. For example, burning rangelands may reduce grass or forage production, thus reducing the available forage for livestock and wildlife.

Livestock and wildlife are often attracted to burned areas. When wildland fires or prescribed burns occur, livestock grazing would be deferred or temporarily suspended to allow establishment and maintenance of new vegetation.

The nature and general objectives for fuels treatments are described in section 3.1.1.3. With Alternative A, about 50,000 acres would be treated with prescribed fire, and 200 acres would be mechanically treated. See Table 6 for a summary comparison of treatment acres by landcover type and alternative.

Chemical weed treatments would be applied to about 500 acres of grasslands under Alternative A and 46,000 acres under Alternative B. Nearly all of the weed treatments would be applied either before or after the areas would be treated with prescribed fire or mechanical methods. Herbicide application would be expected to increase grasses and decrease broadleaf species, shrubs and forbs.

Alternative B would better meet fire management goals on nearly twice as many acres as Alternative A (see Table 6). In the long-term, total plant productivity would also improve with Alternative B.

3.2.2 Shrublands

Affected Environment (Shrublands)

The Montana Gap Analysis (MT-GAP) project classifies shrublands as areas with more than 15 percent shrub cover and less than 10 percent forest cover. Shrublands account for about 28 percent of the land cover (about 2.3 million acres) on BLM administered lands. While sagebrush is the most common category of shrublands, the shrublands category includes other shrub types as well.

Important shrubs include big sagebrush, black sagebrush, low sagebrush, rabbitbrushes, Mormon tea, bitterbrush, snowberry, and horsebrush (Cronquist et al. 1972). Important perennial grasses associated with these shrub communities include bluebunch wheatgrass, Sandberg bluegrass, Idaho fescue, rough fescue, western wheatgrass, Great Basin wildrye, junegrass, Indian ricegrass, squirreltail, muttongrass, needle-and-thread grass, and Thurber needlegrass. Downy brome (cheatgrass) is an introduced annual grass that may exist in some areas.

Environmental diversity has resulted in a comparable variety of species, subspecies, and varieties of sagebrush adapted to specific habitats (Tisdale and Hironaka 1981). Basin big sagebrush and Wyoming big sagebrush usually dominate between 2,000 and 7,000 feet. Basin big sagebrush occupies deep, well-drained alluvial soils where annual precipitation averages 10 to 16 inches, and Wyoming big sagebrush occupies an 8- to 12-inch precipitation zone on shallow soils (Wright et al. 1979). Mountain big sagebrush can be found at elevations from 5,000 to 10,000 feet where annual precipitation varies from 14 to 20 inches (Wright et al. 1979).

Mixed xeric shrubs are associated with dry rocky sites. Dominant species include bitterbrush, creeping juniper,

greasewood, mountain mahogany, rabbitbrush, and shadscale. Mixed xeric shrubs are the dominant species with 20 to 50 percent cover. This category of shrublands is found on about 8 percent of public lands.

Other shrub species found in Montana and the Dakotas include juniper, silver sagebrush, buffaloberry, sumac, rabbitbrush, western snowberry, gooseberry, red osier dogwood, common chokecherry, American plum, and greasewood.

The fire history of shrublands has not been firmly established, but fire was probably uncommon on drier sites because of sparse fuels, and more frequent, averaging 32 to 70 years, on more mesic sites with greater herbaceous production (Wright et. al 1979).

Based on Condition Class information, fire regimes are within an historical range and the risk of losing key ecosystem components is low (Condition Class 1) on about 88 percent of BLM-administered shrublands. Vegetation attributes (species composition and structure) are intact and functioning within an historical range.

About 11 percent of the BLM-administered shrublands are Condition Class 2 and less than 1 percent is Condition Class 3.

Environmental Consequences (Shrublands)

Section 3.1.1.3 describes the treatments anticipated on shrublands. Alternative A would treat less than 1 percent of BLM-administered shrublands over a 10-year period while Alternative B would treat about 3 percent. See Table 6. Shrubs are generally less tolerant of fire than grasses. However, the season and intensity of fire on shrublands also determines the effects of fire.

In mountain brush communities, certain species of shrubs resprout vigorously after fire. Sprouting shrubs, such as western serviceberry, true mountain mahogany, chokecherry, winterfat, saltbush, rabbitbrush, horsebrush, and silver sagebrush may regrow quickly postburn (Wright et al. 1979).

However, the big sagebrush species (Basin big sagebrush, mountain big sagebrush, and Wyoming big sagebrush) are vulnerable to fire and may take up to 20 years to recover. (Harniss and Murray 1973). Basin big sagebrush does not resprout and is eliminated by frequent fires. Mountain big sagebrush may be killed even by fires of light severity, and will not resprout if top killed. Wyoming big sage is also killed by fire. An understanding of big sagebrush's vulnerability to fire comes from past use of fire as an effective means of reducing big sagebrush to increase forage production.

Other sagebrush species, including the silver sagebrush complex, are moderately resistant to fire mortality.

Mechanical treatments and prescribed fire would primarily be used to remove encroaching conifers or open the canopy on dense, stagnant, even-aged stands of sagebrush that are at risk of destruction by wildland fire. In shrublands where conifer encroachment is treated with mechanical treatments and prescribed fire, the density and canopy of shrub stands would be reduced in treated areas. The duration of the reduction would depend on whether the shrubs sprout after fire and post-fire management actions (such as reseeding).

Herbaceous species would increase in density and production in response to burning and as canopy cover is reduced. Perennial forbs would also increase.

3.2.3 Forestlands

Affected Environment (Forestlands)

The Montana Gap Analysis (MT-GAP) project classifies areas with more than 10 percent forest cover as forestlands. Forestlands account for about 9 percent, or 770,000 acres, of BLM lands.

Forestlands are a composite of the many high-elevation evergreen conifer and deciduous forest types that occur throughout Montana and the Dakotas. Species dominance varies with altitude, latitude, slope aspect or other topographical position, soil characteristics, and climatic regime. The BLM administers small acreages of these diverse forest types. Important forest communities include climax ponderosa pine, seral ponderosa pine, Douglas-fir, Douglas-fir mixed with other conifers, aspen, lodgepole pine, and spruce fir.

In May 1977 the USDA Forest Service published Technical Report INT-34, "*Forest Habitat Types of Montana*". This report, commonly referred to as Pfister's Habitat Typing book, is a well-known and often-cited publication.

A general distribution of Climax Series exists throughout Montana. The series begins with the grasslands on the driest, warmest sites and extends through the Alpine Tundra series on the coldest, moistest sites. The first forest type encountered is the Limber Pine Series.

Limber Pine Series: Limber Pine rarely occurs West of the Continental Divide and is typically found on the very driest sites capable of supporting trees. Trees tend to be very short and stubby, (less than 20 ft.) with an understory of native grasses and shrubs such as bluebunch wheatgrass, Idaho fescue and common juniper. These forest stands offer little for timber productivity but do provide value as escape cover for wildlife and some grazing value for domestic livestock.

Fire history indicates that these areas burned with low intensities because of the sparse vegetation.

Ponderosa Pine Series: If the Limber Pine Series is absent, the first forest zone that typically appears is the Ponderosa pine Series. Usually there is a "belt" of climax ponderosa pine that exists between the grasslands and climax Douglas-fir. The difference between the grassland zone (with a few scattered trees), and the ponderosa pine-savanna is recognized to be capable of supporting 25 percent coverage by tree canopy. Fire history indicates that these areas burned with frequent, low intensity ground fires and pure stands of ponderosa pine were often uneven-aged (Pfister, 1977). Stands were probably kept open by light fires that periodically burned through the understory. Older trees tolerate fire well, but young trees are easily killed (Daubenmire 1952). In the absence of frequent understory fires that historically occurred, many stands of ponderosa pine are now dense and stagnant, with thickets of understory reproduction (Wright and Bailey 1982).

Douglas-fir Series: The Douglas-fir series makes up a large portion of the climax forests, but does not extend greatly onto the plains. This is a very broad and diverse forest type. Douglas-fir is more shade tolerant than other associated tree species and the drier stands were maintained through frequent fires. This series begins to have some significant timber productivity potential although the lower elevations and warmer aspects still provide for critical big game winter range and livestock forage.

The range of quaking aspen, which is the most widely distributed native North American tree species (DeByle et al. 1985), coincides closely with Douglas-fir. Fire is responsible for the abundance and even-aged structure of most stands throughout the West. Without human intervention, fire appears to be necessary for the continued well-being of aspen on most sites (DeByle et al. 1985), and most stands will die out or be replaced by conifers without disturbance. The occurrence of fire in aspen stands has been reduced by fire suppression and by lack of understory fuels. The lack of understory herbaceous fuel caused by livestock grazing precludes the occurrence of fire in most aspen stands (Jones and DeByle 1985).

Spruce, Grand Fir, Red Cedar, Hemlock Series: This series is found on the most moist and cool sites and covers a significant portion of the landscape in northwest Montana. The drier habitat types of this series do extend into the central and south central portions of the state. This series includes some of the better timber producing sites and supports a variety of tree species. These habitat types often occur adjacent to streams and other water bodies and are also important big game habitat. History shows that these forests tended to burn infrequently but with a stand replacing fire.

Lodgepole pine occurs primarily in western and southcentral Montana. At higher elevations, it gives way to spruce fir forest. Lodgepole pine forms dense, often pure stands with little understory. Fire plays an important role in the maintenance of these forests. The Rocky Mountain lodgepole pine contains some proportion of closed cones that retain seeds but quickly release them after fire or cutting (Lotan et al. 1981). Lodgepole pine colonizes burned areas, frequently replacing previous stands of lodgepole pine. Without fire, lodgepole pine may eventually be replaced by ponderosa pine, Douglas-fir, Englemann spruce, cedar hemlock, or Englemann spruce/subalpine fir stands. Lodgepole pine may persist as a climax species on sites too cold for Douglas-fir or ponderosa pine, too dry for spruce fir, or too wet or infertile for other coniferous species (Wright and Bailey 1982).

Fuel hazard and declined forest health are not necessarily the same, but commonalities do exist between fuels and ecological conditions. If all fires are excluded from ponderosa pine, Douglas fir, and western larch forest types, which historically had high frequencies of understory fire, the result can be the eventual weakening of the stand, an increase in activity of bark beetles, and an increase in the proportion of dead trees. Barrett (1988) and Stark (1977) also cited accumulations of understory dead woody fuels, as well as the establishment of trees that provide fuel ladders between the surface fuels and the tree crowns, and substantially altered forest succession in some forest types as resulting from fire exclusion. Fuels and/or bug-killed trees lead to stand-destroying fires. Many acres in the West have had fire excluded for 50 to 75 years, and some fires in recent years are likely a result of the accumulation of fuels and insect activity (BLM, 1991, p. F-13).

Fire exclusion on forests with long stand replacement cycles results in increased fire hazard because flammability increases over much greater contiguous areas of forest and younger, less flammable stands are no longer present. For example, lodgepole pine stands that have had time to develop an understory of Englemann spruce and subalpine fir are much more flammable than before those species became established. Complete fire protection will allow less fire-tolerant species to replace more fire-tolerant species, as well as permit coniferous species to take over most sites presently dominated by aspen (DeByle et al. 1985).

Condition Class definitions operate on the degree to which fire has been excluded and thus, in these types, the degree to which the abovementioned characteristics, including ladder fuels, fire sensitive species in the understory, and overstocking, may be present. Treatments would focus on Condition Class 2 and 3 areas, as described below.

About 15 percent of the BLM-administered forestlands are Condition Class 1, 27 percent are Condition Class 2; and 58 percent are Condition Class 3.

Environmental Consequences (Forestlands)

The nature of thinning and prescribed fire treatments in forestlands is described in section 3.1.1.3.

Mechanical treatments and prescribed burning can be effective management tools in forested vegetative communities in the West. Fire can be used to reduce surface fuels in the understories of fire resistant trees; to remove understory reproduction in ponderosa pine, Douglas-fir, and western larch forests, which provide a fuel ladder to the overstory; to thin overstocked stands of trees; to prune lower branches from trees; to create seedbed; to reduce vegetative competition with naturally regenerated or planted conifers; to enhance forage values; to maintain and improve browse quality and quantity; and to rejuvenate old stands of deciduous trees.

Prescribed fire can produce favorable conditions for conifers. Burning ponderosa pine forests increases grasses and top-kills shrubs, such as chokecherry, western serviceberry, and bitterbrush, which will sprout the next year. In general, fire is beneficial to grasses and forbs in ponderosa pine associations but not where shrub understories dominate (Wright and Bailey 1982). Burning Douglas-fir forests would increase shrubs such as snowbush, ceanothus, Western serviceberry, common snowberry, and sticky currant. In some Douglas-fir areas, ponderosa pine and quaking aspen may become fire climax species. Although easily killed by surface fires, quaking aspens quickly sprout from roots, making the tree a quick competitor in many Douglas-fir and spruce fir forests.

The understories of ponderosa pine, Douglas-fir and western larch communities are all adapted to fire. Some later successional species that may have established because of fire exclusion might not be favored, but the natural shrub, forb, and grass associates of these species would recover by sprouting or from seed stored in the forest soil organic layer (duff) after fire. The exact response varies by fire prescription, season, moisture condition, and plant species.

Slash from thinning and selective logging can be burned to reduce fire hazard without harming the residual trees in these communities. Without fire, ponderosa pine and Douglas-fir sometimes invade grasslands and shrublands, and prescribed fire can be used to eliminate these trees when they are young.

Mature stands of juniper are frequently too open or contain insufficient herbaceous fuel to carry a fire (Lotan and Lyon 1981). However, burning can easily kill nonsprouting juniper, especially trees less than 4 feet tall (Dwyer and Pieper 1967). Larger trees require heavy amounts of fire fuel within their canopy coverage to crownkill (Jameson 1962). Where understories include sagebrush, large juniper trees can be killed by fire (Bruner and Klebenow 1978).

Postfire recovery of juniper after fire depends on seed reproduction, and the rate of reinvasion depends on distance to seed source, the size of the burned area, and the presence of dispersal agents.

Older trees are generally more fire resistant as bark thickens and the crown becomes more open, and may be able to survive low intensity fires. It is difficult to kill trees in fairly closed stands of juniper because there is little live or dead fuel on the surface, and a prescribed fire will not carry unless there are extremely high winds, a situation in which risk of fire escape is high. A treatment in juniper stands is to manually cut the trees, leave the slash scattered, wait several years for grasses and shrubs to recover, and then burn the site. This removes most of the dead fuel, greatly reduces the fire hazard, and kills any residual or newly germinated juniper trees. If a site is mechanically or manually treated only, forage and browse production will probably be enhanced for about 20 years. Prescribed burning of the site about 3 to 5 years after treatment, once an understory has established, will maintain the productive character of the site for about 50 years (West 1979, as cited in Tiemenstein 1986b, Wright et al. 1979, as cited in McMurray 1986b). If high rates of forage utilization (which reduce fuels) and fire exclusion continue to be practiced on sites invaded by juniper, tree density will continue to increase, and juniper will continue to expand onto shrub- and grass-dominated sites (Burkhardt and Tisdale 1976). An active management program that includes prescribed fire would reduce the amount of tree encroachment and would better achieve the desired resource condition.

The occurrence of fire in aspen stands has been reduced by fire suppression and by lack of understory fuels. The lack of understory herbaceous fuel caused by livestock grazing precludes the occurrence of fire in most aspen stands (Jones and DeByle 1985). Without fire, conifers invade many aspen stands, gradually eliminating the aspen, because aspen sucker replacement is often insufficient to replace overstory aspen mortality (Schier 1975). Aspen communities on sites not suited for conifer establishment may eventually be replaced by grasses and shrubs (Schier 1975). Suckering is prevented by the presence of mature trees as the trees and roots gradually deteriorate. Loss of aspen stands because of this phenomena has been observed in several western states. A fire that occurs in an aspen stand that is still producing a few suckers, or in a mixed aspen conifer stand is likely to result in the rejuvenation of the aspen stand. The amount of postfire suckering is enhanced by warmer soil temperatures, which usually occur as a result of the blackened soil surface and reduced thickness of the litter and organic layer (Jones and DeByle 1985). As is true for rangeland sites, an aspen site must be rested from grazing until the community recovers to some degree (Brown and Simmerman 1985). Wildlife use can be regulated to some extent if a large enough burned area is selected, or if several areas in the same general

vicinity are burned, thus dispersing use over a greater acreage.

Treatments would provide a range of forested and non-forested vegetative successional stages that reflect natural processes and maintain or improve ecosystem health. Both alternatives would reduce the amount of dense, multistory stand conditions. Both alternatives would maintain mosaics of untreated component of high percent canopy cover, multistory, dense, mature to overmature stand conditions within treated areas.

Treatments (commercial harvest, pre-treatments, and prescribed fire) would result in increased sunlight, increased soil moisture, and decreased needle mat, which would stimulate growth of understory plants.

On untreated areas, tree density would continue to increase. This would increase competition for limited water, nutrients, and light in absence of disturbance. This would result in decreased health and vigor of the trees and reduce forest health.

Nearly all of the weed treatments would be applied before and/or after the areas are treated with prescribed fire or mechanical methods.

Fewer acres of dense, multi-story stand and closed-canopy conditions would be treated under Alternative A. These conditions heighten the risk of stand replacement wildfire. Forest health would also continue to decline on more areas with Alternative A, since fewer dense, overstocked stands would be treated.

Hazardous fuels treatments of ponderosa pine forestlands in the Big Dry Planning Area would be affected by an existing decision that prohibits sales of sawtimber (except for salvage harvest and sale of ponderosa pine affected by insects, fire, or other natural causes). Remaining management options for treating hazardous fuels would include the use of prescribed fire and mechanical treatments that do not include sale of sawtimber (i.e., treatment of small-diameter trees and cutting but piling or chipping sawtimber-sized logs). However, treatments that involve piling or chipping sawtimber (rather than making it available to sustain the local economy) would be inconsistent with the intent of forest manual 5000-1, which establishes utilization of commercial products as a basic tenet of the forestry program. Therefore, those treatments that necessitate removal of sawtimber before prescribed fire can be used safely or small-diameter trees can be treated effectively would be inconsistent with current RMP decisions. Since dry, low elevation forests like ponderosa pine have been among those most affected by departure from the natural fire regime, the limitation on management options within the Big Dry planning area would severely constrain BLM's

ability to treat hazardous fuels and allow fire to play its natural role.

Although Alternative B includes more acres of treatment and thus increases potential for spread of noxious weeds, chemical weed treatments would be applied in support of the fuels project to mitigate the increased potential. These treatments would generally be applied before fuels reduction treatments, and would also be applied after treatments if necessary.

Under Alternative B, dense, overstocked multistory stand conditions would be reduced on more than twice as many acres with Alternative B than with Alternative A. The intensity and severity of wildland fires would be reduced on 37 percent of BLM forestlands over a 10-year period. As fires become less severe, the adverse impacts of wildland fire suppression activities would also be reduced on these areas, as would the extent of rehabilitation needed after wildland fire.

With Alternative B, the sale of sawtimber in the Big Dry Planning Area would be allowed. This would make fuels treatments less costly, more effective, and more feasible.

3.2.4 Special Status Plant Species

Affected Environment (Plants – Special Status Species)

BLM Manual 6840 provides policy and direction for the conservation of special status species of plants and animals, and the ecosystems upon which they depend. Categories of Special Status Species (SSS) are: A.- Federally Listed Threatened and Endangered Species and Designated Critical Habitats; B. – Federally Proposed Species and Proposed Critical Habitats; C. – Candidate Species; D. – State Listed Species; and E. – BLM Sensitive Species.

An analysis of effects to federally listed threatened, endangered, and proposed species, proposed and designated critical habitat is provided in the Biological Assessment and is summarized in Section 3.8 of this document. The Biological Assessment prepared for this proposed action, along with the Letter of Concurrence and Biological Opinion from the Fish and Wildlife Service, are incorporated in their entirety into this Environmental Assessment by reference and are available upon request.

Other plant species that exist in the area of influence and are given special consideration under BLM Manual 6840 include 28 BLM sensitive plants. See Table 7.

The State (North and South Dakota) threatened and endangered species list and the Montana Species of Concern list contain other species in addition to those on the federal

list. BLM gives all special status species consideration to ensure continued survival.

Environmental Consequences (Plants - Species of Concern):

Unidentified, unknown populations of special status plants in or near a treatment area would be vulnerable to any of the impacts discussed under impacts to vegetation. Special status plants could benefit from treatments designed to enhance habitats; e.g., removal of competing exotics.

All BLM actions would be evaluated for potential effect on BLM Sensitive and federally listed species. However, some direct and indirect impacts would occur.

Little or no impact would be anticipated since sites would be inventoried for species of concern prior to treatment. Because of current guidance, there would be no impact on BLM land to federally listed species, under either alternative. BLM would consult with appropriate state agencies for adverse impact to state-listed species. Species of concern that are not federally protected may be impacted by habitat changes or in association with vegetation removal.

Table 7 BLM (Montana and Dakotas) Designated Plant Sensitive Species

| Common Name | Scientific Name | Known Occurrence |
|----------------------------|--------------------------------------|---------------------|
| Cusick's horse-mint | <i>Agastache cusickii</i> | Dillon FO |
| Sapphire rockcress | <i>Arabis fecunda</i> | Butte FO, Dillon FO |
| Painted milkvetch | <i>Astragalus ceramicus apus</i> | Dillon FO |
| Geyer milkvetch | <i>Astragalus geyeri</i> | Billings FO |
| Bitterroot milkvetch | <i>Astragalus scaphoides</i> | Dillon FO |
| Railhead milkvetch | <i>Astragalus terminalis</i> | Dillon FO |
| Obscure evening-primrose | <i>Camissonia andina</i> | Billings FO |
| Small camissonia | <i>Camissonia parvula</i> | Billings FO |
| Craw's sedge | <i>Carex crawei</i> | Lewistown FO |
| Idaho sedge | <i>Carex parryana idahoa</i> | Dillon FO |
| Miner's candle | <i>Cryptantha scoparia</i> | Billings FO |
| Sand wild-rye | <i>Elymus flavescens</i> | Dillon FO |
| Smooth buckwheat | <i>Eriogonum salsuginosum</i> | Billings FO |
| Garnet bladderpod | <i>Lesquerella carinata languida</i> | Missoula FO |
| Pryor Mountains bladderpod | <i>Lesquerella lesicii</i> | Billings FO |
| Beautiful bladderpod | <i>Lesquerella pulchella</i> | Dillon FO |
| Taper-tip desert-parsley | <i>Lomatium attenuatum</i> | Dillon FO |
| Desert dandelion | <i>Malacothrix torreyi</i> | Billings FO |
| Nama | <i>Nama densum</i> | Billings FO |
| Pale evening-primrose | <i>Oenothera pallida idahoensis</i> | Dillon FO |
| Lemhi beardtongue | <i>Penstemon lemhiensis</i> | Dillon FO |
| Whipple's beardtongue | <i>Penstemon whippleanus</i> | Dillon FO |
| Bur oak | <i>Quercus macrocarpa</i> | Miles City FO |
| Shoshonea | <i>Shoshonea pulvinata</i> | Billings FO |
| Chicken sage | <i>Sphaeromeria argenta</i> | Dillon FO |
| Rocky Mountain dandelion | <i>Taraxacum eriophorum</i> | Butte FO, Dillon FO |
| Alpine meadowrue | <i>Thalictrum alpinum</i> | Dillon FO |
| Northwestern thelypody | <i>Thelypodium paniculatum</i> | Dillon FO |

Conclusion (Vegetation):

Condition Class 2 and 3 characteristics occur on 6 percent of grasslands, 12 percent shrublands, and 85 percent of forestlands administered by the BLM.

With both alternatives:

- ü Little or no impact would be anticipated on Special Status plant species since sites would be inventoried for species of concern prior to treatment. Because of current guidance, there would be no impact on BLM land to federally listed species, under either alternative. BLM would consult with appropriate state agencies for adverse impact to state-listed species. Species of concern that are not federally protected may be impacted by habitat changes or in association with vegetation removal.
- ü With proper management, including application of Standards for Rangeland Health, most treated lands would move toward proper functioning condition.
- ü Treatments would help sustain the ecological health and function of fire-adapted grasslands, shrublands, and forestlands.
- ü The size, intensity, and severity of wildland fires would be reduced within treated areas. The risk of losing key ecosystem components would be reduced.
- ü On areas with Condition Class 2 and 3 attributes that are not treated, trends (conditions) created by fire exclusion would continue, including:
 - o Dense, overstocked stands of timber in fire adapted forests that are beyond their natural fire return intervals. These stands are typically vulnerable to insects and disease.
 - o Loss of grassland and shrubland habitats to conifer encroachment.
 - o Moderate to high potential for catastrophic wildland fire.
- ü Based on the proportion of total BLM lands that would be treated over 10 years and application of Standards for Rangeland Health, no unacceptable adverse or significant impacts on vegetation would be anticipated with fuels treatments proposed under either alternative.

Neither alternative would cause a significant impact to the ecological health of grasslands, shrublands, or forestlands.

With Alternative A:

- ü About 193,000 acres would be treated within a decade (130,000 acres of forestlands, 50,000 acres of

grasslands, 9,000 acres of shrublands, and 4,000 acres of other lands).

- ü Fuel treatments would affect about 1 percent of BLM administered grasslands and shrublands and about 17 percent of forestlands.
- ü After the treatments completed in the 10 years, Condition Class 2 and 3 characteristics would remain on an estimated 5 percent of grasslands, 11 percent of shrublands, and 68 percent of forestlands.
- ü Since fewer acres would be treated, full suppression would continue to be necessary on more acres compared to Alternative B. The opportunity for wildland fire to play its natural role or achieve resource benefits would also be limited on these acres.

With Alternative B:

- ü About 457,000 acres would be treated per decade (283,000 acres of forestlands, 90,000 acres of grasslands, 77,000 acres of shrublands, and 7,000 acres of other lands).
- ü Fuel treatments would affect about 2 percent of BLM administered grasslands, 3 percent of shrub lands, and about 37 percent of forestlands.
- ü After 10 years, Condition Class 2 and 3 characteristics would remain on an estimated 4 percent of grasslands, 9 percent of shrublands, and 48 percent of forestlands.
- ü Alternative B would reduce hazardous fuels, improve the ecological health of forestlands, and contribute to proper functioning condition on more than twice as many acres that are beyond their natural fire cycles as compared to Alternative A. Alternative B would better meet the goals of increasing protection of human life and property, reducing the risk and cost of severe wildland fires, minimizing the adverse effects of wildland fire suppression, and meeting other fire and resource management objectives.

3.3 Air Quality (BLM Critical Element)

Affected Environment (Air)

In undeveloped areas, ambient air pollutant levels should be near or below measurable limits. Locations near industrial developments and population centers are most vulnerable to air quality impacts from emissions sources such as automotive exhaust, residential wood smoke, and industrial pollution. Noise levels are site specific, and are variable. Rural noise levels should average less than 50 decibels A-weighted (dbA), with occasional peak levels to 70 dbA.

National Ambient Air Quality Standards limit the amount of specific pollutants allowed in the atmosphere: carbon monoxide, lead, nitrogen dioxide, ozone, sulfur dioxide, and particulate matter (inhalable particulates, or PM_{10} , and fine particulates, or $PM_{2.5}$).

Any decisions or actions related to prescribed burning and other fuel reductions projects must comply with air quality legislation, including the Clean Air Act of 1977. Through the Clean Air Act, Congress established a system for the Prevention of Significant Deterioration (PSD) of areas with air pollutant concentrations below the national standards (designated as “attainment” or “unclassified”). PSD areas are classified by the additional amounts of nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and inhalable particulate matter (PM_{10}) degradation that would be allowed above a legally defined baseline level. PSD Class I areas, predominately large National parks, wilderness areas, and certain Indian reservations, have the greatest limitations; virtually any degradation would be apparent. Areas where moderate controlled growth can take place have been designated as PSD Class II. PSD Class III areas allow the greatest degree of degradation.

The PSD regulations also address potential impacts to Air Quality Related Values (AQRVs) within mandatory Federal Class I areas. These AQRVs include visibility, odors, and impacts to flora, fauna, soils, water, geologic and cultural structures. A possible source of impact to AQRVs is acid precipitation.

All BLM administered lands in Montana, South and North Dakota are designated PSD Class II. However several areas near BLM administered public lands are mandatory Federal Class I areas. These include the Anaconda-Pintler Wilderness, Gates of the Mountain Wilderness, Selway-Bitterroot Wilderness, Glacier National Park, Cabinet Mountain Wilderness, Mission Mountains Wilderness, Scapegoat Wilderness, Bob Marshall Wilderness, Medicine Lake Wilderness, UL Bend Wilderness, Yellowstone National Park, Red Rock Lakes Wilderness, Lostwood Wilderness, Theodore Roosevelt National Park (North Unit, Elkhorn Ranch Unit, and South Unit), Wind Cave National Park, and Badlands Wilderness. In addition, the Flathead Indian Reservation, Fort Peck Indian Reservation, and Northern Cheyenne Indian Reservation have been redesignated PSD Class I areas, although the Fort Belknap Indian Reservation remains a PSD Class II area.

Areas that consistently violate federal standards because of human activities are classified as “nonattainment” and must implement a plan to reduce ambient concentrations below maximum pollution standards. Nonattainment areas in Montana include Great Falls, Columbia Falls, Flathead County (Whitefish and vicinity), Kalispell, Polson, Ronan, East Helena, Libby, Missoula, Lake Deer, Sanders County (Thompson Falls and vicinity), Butte, Billings and Laurel.

There are no nonattainment areas in North or South Dakota. All Bureau authorized or initiated activities within these areas are required to perform a “conformity” applicability determination and/or analysis before the action may take place.

Environmental Consequences (Air)

Fires are a source of air pollutant emissions during combustion of various ages, sizes, and types of vegetation. The amount of emissions depends on the size and intensity of the fire, the fuel type and moisture content, and the available fuel loading. The level of resulting air quality impact depends on the amount and duration of emissions, atmospheric dispersion conditions, and terrain. The most effective means of controlling air pollutant emissions from wildland fire is to reduce the number of large, catastrophic fires through selective vegetation treatments that break up heavy, continuous fuels. Depending on the conditions, managed natural fires, prescribed fires, and mechanical treatments can be effective methods to reduce heavy fuels. When properly executed, managed fires may be much smaller and involve less combustion, occurring when the fuel type, loading and fuel characteristics, as well as weather conditions, are optimized to enhance efficient fuel consumption and air pollutant dispersion. By reducing the risk of uncontrolled wildland fire, the risk of significant air quality impacts is also reduced.

Other impacts to air quality would include moderate increases in noise, dust, and combustion engine exhaust generated by manual and mechanical treatment methods, aerial application of fire retardant, moderate noise and minimal chemical drift from application of herbicides. Resulting impacts would be temporary, small in scale, and quickly dispersed. These factors, combined with standard operating procedures, would minimize potential air quality impacts. Applicable federal, state, tribal and local air quality regulations would not be violated.

Potential air quality impacts would be assessed before project implementation. Site-specific plans would be reviewed for compliance with applicable laws and policies, and existing air quality would be inventoried so that changes associated with the BLM proposals may be determined. Additional mitigation may be incorporated into specific project proposals to further reduce potential impacts. For example, prescribed burning activities must comply with the BLM Manual Sections 9211.31 (E), Fire Planning, and 9214.33, Prescribed Fire Management, to minimize air quality impacts from resulting smoke. This procedure requires compliance with individual state and local smoke management programs that specify the conditions under which burning may be conducted.

Particulate matter and carbon monoxide are the primary air pollutants emitted during prescribed burning. Compliance

with local smoke management programs would minimize these effects. The timing, vegetation type, size of burns, fuel arrangement and moisture, ignition techniques and patterns, and weather conditions are all specified to keep smoke concentrations within acceptable limits. The actual level of impact will depend on a combination of all these factors. Prescribed burning would generally occur under more favorable atmospheric dispersion conditions to meet air quality regulations since the timing and location of wildland fires cannot be controlled.

The Montana/Idaho Executive Airshed Board, which includes members from federal and state agencies and private industry, coordinates regional smoke impacts and smoke management for prescribed fires.

Accumulation of smoke from controlled burning is limited through scientific monitoring of weather conditions and formal coordination of burns. For Montana, BLM submits a list of planned burns to the Monitoring Unit in Missoula, Montana. For each planned burn, information is provided describing the type of burn to be conducted, the number of acres, as well as the location and elevation at each site. Burns are reported by "airshed," which are geographical areas with similar topography and weather patterns. The program coordinator and a meteorologist provide timely restriction messages for airsheds with planned burning. Weather balloons may be launched and tracked to identify specific atmospheric conditions to aid in decision-making. The Missoula Monitoring Unit issues daily decisions that can restrict burning when atmospheric conditions are not conducive to good smoke dispersion. Restrictions may be directed by airshed, elevation or by special impact zones around populated areas. The Monitoring Unit announces burning restrictions through 17 airshed coordinators located throughout Idaho and Montana. There is no formal organization to coordinate smoke management issues in the Dakotas.

Potential cumulative impacts could occur when multiple fires occur simultaneously or when other non-fire related activities are also contributing to air quality impacts. Under current procedures, if the cumulative impacts are anticipated to violate applicable air quality standards, prescribed burns are not conducted until conditions improve.

Conclusion (Air):

Overall, air quality impacts would be greater from wildland fires than from fuel treatments since wildland fires are generally larger and often occur under poor atmospheric dispersion conditions. Since more severe wildland fires are expected to occur under Alternative A, air quality impacts are expected to be greater than under Alternative B, even though Alternative B would have a greater number of prescribed fires and other fuels treatments. Cumulative air

quality impacts from multiple wildland fires are more likely under Alternative A.

Neither Alternative A nor Alternative B would exceed state or federal ambient air quality standards as the result of fire and fuels management.

3.4 Soils

Affected Environment (Soils)

Soils are extremely variable across Montana and the Dakotas, having different physical characteristics such as depth and texture; and different chemical properties such as alkalinity and nutrient content. These characteristics are influenced by parent material, regional and local climate, vegetation, slope, aspect and time. The hundreds of soil types that occur on BLM lands are referenced in most BLM Resource Management Plans (RMPs), and are available from related published soil surveys, electronic data files and various web sites.

Soils located on BLM lands in Montana and the Dakotas have developed in a semi-arid environment that provides for the many combinations of soil forming factors to affect soil development, use and management. These various combinations of soil properties influence and in many instances control the amount and types of vegetation, land use and potential vegetation.

Environmental Consequences (Soils)

Prescribed burning affects soils primarily by consuming live vegetative cover; litter; organic soil layers; down, dead, and wood fuels (Wright and Bailey 1982). Fire may alter soil chemical properties, nutrient availability, postfire soil temperatures, microorganism populations and their activity rates, and erosion. The degree of short-term effect on these characteristics depends on the ignition technique; dead fuel, live fuel, thickness, and density of litter and organic layers. Soil texture, soil moisture at the time of burning, and depth and duration of lethal heat penetration into organic and soil horizons are all critical factors. Significant deep soil heating would be anticipated when there is long duration burning in thick organic layers of heavy accumulations of dead woody debris, such as slash piles (Frandsen and Ryan, 1986). Moist soils limit the depth of soil heating.

Nutrient and soil losses from a burned site and postfire erosion are closely related to burn severity, soil type, topography, and remaining plant cover. The single most important erosion factor is the timing of vegetative recovery with the severity of precipitation events. If postfire rains are gentle, some nutrients released by a fire may be reabsorbed; however these nutrients are generally lost during severe, erosive rainfall.

Changes in soil chemical properties, including soil nutrients, caused by burning usually include an increase in soluble nitrogen, phosphorus, potassium, sulfur, magnesium, sodium, and calcium, and an increase in soil pH (Fuller et al 1955; Summerfield 1976). After very severe burns, however, actual increases/decreases may be different.

Soil microorganism mortality depends on depth and duration of soil heating; initial decline is anticipated postburn (Jurgenson et al 1979) but populations may quickly recover to greater than preburn populations (Wright and Bailey 1980). Nitrifying bacteria, however, are extremely sensitive to fire over wet and dry soil and do not recover quickly (Dunn and Debano 1977). Heterotrophic bacteria respond similarly but at higher temperatures (ibid). When related to metabolic processes, microbial populations are not adversely affected by prescribed burning (Wright and Bollen 1961, Jorgenson and Hodges 1971, Summerfield 1976).

Appreciable changes in soil mineral fractions would not be anticipated as a result of prescribed burning (Beaton 1959, Summerfield 1976). The impacts caused by severe fires; e.g., loss of structure and reduced porosity/infiltration rates (Ralston and Hatchell 1971) can be avoided with a properly designed prescribed fire prescription.

The potential for significant post-fire erosion depends on the amount of residual vegetation and organic matter, the rate and amount of vegetative recovery, and slope. These factors would be considered before prescribed burning. On forestland soils, litterfall of scorched conifer needles may minimize erosion. Effects to fragile or erodible soils can be mitigated by prescribing for the needed amount of fuel and organic layer moisture to minimize organic layer removal; timing the fire so that seasonal vegetation recovery would occur soon after the burn; and leaving mosaics of unburned areas within the fire perimeter.

Additional information specific to vegetation types is provided below.

Sagebrush: Most litter associated with sagebrush plants is located directly under the plant; physical and chemical effects from soil heating would primarily occur in this area. Wind erosion of topsoil is likely on exposed areas. Seasonal timing of the burn in relation to plant recovery is especially important; seasonal potential for severe precipitation or high winds should be considered for these sites during project planning.

Summerfield (1976) found that organic matter, pH, and nitrogen may increase in soil surface layers following prescribed burns, but an earlier report by Blaisdell (1953) found that pH did not change after sagebrush grass burning. Burning sagebrush and leaf mulch may produce short-term water repellency in soils under sagebrush plants; however,

burning while soil and mulch are cool will reduce or eliminate this potential (Salik et al 1973).

Forest/Woodlands: Organic matter reduction is correlated to the reduction in total nitrogen on the forest floor; however, nitrogen accumulation occurs in the 0-to-2 inch soil layer (Wells et al 1979). Phosphorus, potassium, calcium, and magnesium may increase in the 0-to-2 inch layer of forest soils post-burn (Wells et al 1979), although Campbell et al (1977) reported lower levels of potassium in burned (as compared to unburned) plots. Prescribed burning does not appear to alter soil microorganism populations to the extent that soil metabolic processes would be impaired (Jorgenson and Hodges 1971); rather, it seems to enhance metabolic processes in the short term.

Physical properties, primarily water infiltration, would be most at risk from severe burning, whereas they are only slightly affected by light burning (Fuller et al 1955). Low moisture in fuels, duff and soil (e.g. during periods of drought), in combination with heavy fuel loads, create the potential for severe burning. Temporary increases in overland water flow and erosion may also result where severe fires denude soil cover and alter soil physical properties (Hendricks and Johnson undates, Holecheck et al 1989).

Holecheck et al (1989) also found that burning heavy fuels such as forest slash may decrease soil aggregates and porosity, and increase bulk density for up to four years; some forest soils beneath slash piles may also become temporarily resistant to wetting after piles are burned.

Soils that support juniper may show reduced infiltration rates following burns (Buckhouse and Gifford 1976a) and increased amounts of phosphorus, potassium, nitrogen, and carbon for the first year following debris pile burns (Gifford 1981). Buckhorse and Gifford (1976b) noted greater amounts of potassium and phosphorus in overland flow from burned areas as compared to unburned areas. The 1991 Vegetation Treatments EIS also noted potential for soil sterilization caused by pile burning on soils that support juniper. Burning the slash where it falls, rather than piling it, can reduce the potential for sterilization, and may improve nutrient release and efficacy of the fuels treatment as well.

Grasslands: Excessive litter accumulations may reduce microorganism activity (Wright and Bailey 1982) and nitrification; nitrogen-fixing and ammonification are increased by pH and the increased concentration of electrolytes after burning. Soil losses after burning on most grasslands are minimal because the grasses evolved under frequent fire regimes and have root systems adapted to fire. Roots from sod and bunch grasses remain in place, reducing erosion and facilitating rapid vegetation recovery.

Severe (high soil temperature) burns on mountain/plateau grassland sites may form a water-repellant layer in some soils (USDA 1988). However, this direct impact to soil infiltration rates is typically avoided with prescribed burns.

Conclusion (Soils)

Treatments associated with Alternative A would help achieve soil-related land health standards (soil stability and watershed function) on approximately 193,000 acres per decade. Indicators to assess soil stability and watershed function relate to soil erosion and infiltration or capture and use of precipitation.

The number of acres burned by wildland fires, the severity of those fires, and the acres needing rehabilitation, would be lower with Alternative B, mainly on category B and C fire management zones.

Treatments anticipated with Alternative B would help achieve soil-related land health standards (soil stability and watershed function) on more than twice as many acres over a 10-year period as compared to Alternative A.

3.5 Water Quality (BLM Critical Element)

The Safe Drinking Water Act of 1974 establishes protective measures for culinary water systems by providing standards that regulate allowable contaminant levels. This would not be affected by either fire management alternative.

The Clean Water Act of 1977, as amended by the Water Quality Act of 1987 provides national policy and mandates the control of non-point pollution. Agencies are directed to develop and implement programs to meet the goals of this act through the control of both point and non-point pollution.

Environmental Consequences (Water)

Wildland fires and fuel treatments reduce vegetation cover that buffers raindrops before they hit the soil surface. The lack of vegetative cover on burned or treated areas allows raindrops to increase soil loss and sediment input to surface waters. Burned sites have lower soil-water infiltration rates which increases surface runoff and decreases soil moisture available for plants. Increased runoff can stress the stability of receiving streams and the associated aquatic biota. The seasonal timing, size, duration, and intensity of fires and fuels treatments determine the magnitude of impacts.

Intense wildland fires cause greater increases in water temperature, sedimentation, and turbidity by burning off vegetative cover, exposing mineral soil, and increasing runoff. Accelerated erosion also increases with surface disturbing activities such as the use of heavy equipment to blade fire lines, hand tool fire line construction, and off road

vehicle use. Sediment from accelerated soil erosion and elevated levels of nitrogen and phosphorous from ash are common in water after wildfires. Water quality impacts related to fire and disturbance depend on the amount of accelerated erosion. Often these impacts are short term and conditions return to pre-fire levels once vegetation is re-established. Burning or killing streamside vegetation reduces shade and increases water temperature.

Fire retardant is never intentionally dropped on surface waters. However, accidental releases and fish kills do occur. When sodium ferrocyanide, commonly used as a corrosion inhibitor in fire retardant formulations, is dissolved in water and exposed to ultraviolet radiation, it breaks down to form hydrogen cyanide, which is toxic to aquatic life. Ammonia is highly soluble and typically results when fertilizers or retardants are added to water. In highly alkaline waters ammonia concentrations increase and can reach toxic levels. Guidelines for Aerial Delivery of Retardant or Foam Near Waterways require retardant or foam to be kept 300 feet from lakes, rivers, streams and ponds.

Both prescribed fire and mechanical fuels treatments increase stream nutrients, storm flows, and sediment loads; the amount of increase depends on fire severity or the amount of disturbance. Slash burns increase concentrations of some nitrogen compounds and cations; however, drinking water standards would not be exceeded. Underburns and grassland burns would have no significant effect on nutrients. Moderate slash burns may increase storm flow volumes and peaks to streams by reducing the water used by remaining vegetation. Severe burns expose mineral soil and increase surface runoff through decreased soil permeability. Decreased permeability is most common in shrub communities located on dry sandy soils (Debano et al. 1976), but also occur in forest soils (Zwolinski and Ehrenreich 1967). Underburns would not affect water quality, and grassland burns would affect it for only a few weeks until grass re-grows. These burns would not significantly affect stream flows.

Invading junipers often compete with and eventually reduce understory vegetation. Resulting bare soils are subject to accelerated erosion. These trees use much more moisture than shrubs, forbs, and grasses. Treatments that removes these trees cause increased water yield, rejuvenate springs, allow understory to recover, and provide more watershed protection.

To protect water quality and Special Status and sport fish habitat, a Streamside Management Zone (SMZ) would be maintained around riparian, streamside, lakeside, and wetland areas. This 50-foot (minimum) buffer zone helps preserve ecological processes by creating a vegetation filter that removes sediment before it reaches water bodies (Montana State University, 1991).

Properly maintained SMZs protect trout fry and other young fish; maintain water temperatures necessary for spawning; introduce insects and other fish food to the water from streamside vegetation; stabilize streambanks and floodplains; and protect bird habitat and wildlife travel corridors associated with riparian areas. To minimize erosion and the amount of sediment that reaches waterways, care would be given to maintaining an SMZ of appropriate width.

Conclusion (Water)

In the long term, treatments anticipated with both alternatives would help reduce the risks of wildland fire impacts by improving the resource condition. Treatments would improve the ecological health and function of grasslands, shrublands, and forestlands per decade and would help maintain water quality in water bodies within the affected watersheds. Indicators would include one or more of the following: dissolved oxygen concentrations, pH, turbidity, temperature, sedimentation, water color, and toxins.

Alternative B would better meet the land health standard of meeting state water quality standards because upland health would be improved by treating about 457,000 acres compared to 193,000 acres with Alternative A.

Many of the potential water quality impacts from prescribed fires and mechanical fuels treatments would eventually be offset by reduced impacts from wildland fires. There is a greater expectation of increased water temperature, sedimentation, pH, ammonium, phosphate, and turbidity under Alternative A because of a greater long-term likelihood of severe wildland fire, especially on forestlands. Wildfires in these areas burn hotter and are more likely to also burn riparian areas that protect stream and ponds.

3.6 Aquatic Habitats and Species (excluding federally listed Threatened, Endangered, and Proposed Species)

Affected Environment (Aquatic Habitat and Species)

Aquatic environments across the planning area are extremely variable, reflecting diverse geological settings, climates, disturbance histories, and past management. Aquatic habitat-types range from small, high-gradient montane streams to low-gradient large rivers such as the Missouri. Lakes, vernal ponds, wetlands and springs are all present across the planning area. Riparian and aquatic areas comprise only a small portion of the lands managed by the BLM; however, their ecological significance is far greater than their limited physical scope as these systems form some of the most dynamic and ecologically rich portions of the landscape (Elmore and Beschta 1987).

Under natural conditions, riparian and aquatic ecosystems have a high degree of structural complexity, reflective of past disturbances such as floods, fire, ice floes, wind storms, grazing, disease and insect outbreaks (Gregory et al. 1991). In planning area riparian woodlands, fires were historically infrequent but often severe, generally occurring at 65- 150-year recurrence intervals when appropriate weather, fuel, and ignition conditions were present. In the riparian shrub communities, fire was typically more frequent, occurring every 25 to 50 years.

Historically, whether streamside vegetative communities were substantially burned or not, fires altered watersheds and aquatic systems, primarily through changes in sediment and stream flow regimes. These effects, however, were extremely variable. Watershed characteristics such as vegetation structure and seral-stage, inherent geology, pattern of geomorphic processes, and local climate and weather combined to influence the trajectory and magnitude of post-fire change to aquatic systems.

Humans have altered stream aquatic and riparian environments by direct modifications (channelization, wood removal, diversion, dam-building, irrigation de-watering) and indirect impacts (from timber harvest, mining, grazing, and road building). These activities have altered channels by changing the rate at which sediment, water, and wood enter and are moved through streams. Anthropogenic activities have also affected the incidence, frequency, and magnitude of the natural disturbance events described above (McIntosh et al. 1994; Wissmar et al. 1994).

Fishes

Like the variety in aquatic and riparian habitat-types across the planning area, aquatic species communities are extremely diverse. Patterns of fish species diversity in the planning area reflect the glacial history of the area. East of the Continental Divide, after the retreat of the Laurentide Ice Sheet, the area Missouri River Basin was re-colonized by fishes from southern refugia in the Missouri River. In the Missouri Basin, salmonid species are present in colder, higher-gradient streams; however, a diverse assemblage of fishes adapted to warmer waters and lower-gradient streams is present. In addition to numerous species in the Cyprinidae and Catostomidae families, glacial “relicts” such as pallid sturgeon and paddlefish are present.

Fish species assemblages on the west side of the Continental Divide (primarily the Missoula Field Office) are typical of formerly glaciated regions: the absence of major refugia meant that fewer species survived glaciation, but among those species, numerous genetically divergent populations or “stocks” evolved. These unique stocks often exhibit unique morphology, behavior, and life histories specially adapted to their home environment (Wood 1995, Schluter 1996).

Fishes in the planning area evolved in habitats characterized by frequent and occasionally severe disturbance. Floods, fire, and wind storms helped to create and maintain the structurally complex environments important for the all life stages of many fish species. In montane aquatic environments in particular, fire and flood were the two primary natural disturbance mechanisms responsible for initiating stream dynamics and increasing habitat complexity and diversity. Erosion and woody debris recruitment following forest fires was critical in re-establishing young, biologically rich stream systems (Keane et al. 1999). Over longer time periods, fires recycled nutrients, regulated forest development, and biomass. The effects of these processes were ultimately transferred to stream channels. It is likely that drainage-scale extirpations of fishes followed large-scale, intense wildfires; however, regional populations were strong enough to provide individuals to quickly recolonize impacted areas.

Habitat fragmentation by dams, road culverts, stream dewatering, or temperature barriers have isolated populations and can preclude fish from moving to avoid localized fire effects. Historically, if local extinctions did occur, these areas were refounded by nearby populations through an "open" stream network. Current conditions often prevent this as populations have been isolated by irrigation withdrawals, dams, culverts, etc. Thus, local impacts may affect population viability more than they would have historically.

Habitat condition (quality) has declined and become less diverse, leaving native fish populations less fit and less resilient to watershed disturbances. Roads have been identified as one of the most significant factors in stream habitat degradation (Meehan 1991, USDA 1997). Historically, roads were not present and didn't affect hydrologic or erosional patterns. Now, however, extensive road networks contribute chronic sediment inputs to stream systems. Effects are compounded when fires remove trees and other vegetation within drainages.

The depletions of native fishes in the Planning Area have been well documented. Westslope cutthroat trout currently occupy only 2.5 percent of their historic range in Montana; Yellowstone cutthroat trout are found in 32 percent of their historic range (primarily in headwater streams); and fluvial Arctic grayling are limited to 4 percent of their native range. Only salmonids are described because much more is known about their population trends. The 18 Special Status fish species are listed in Table 8.

Amphibians

Amphibians (salamanders, frogs, and toads) are extremely important in aquatic and riparian ecosystems. Because they reach tremendously high biomasses in some areas, they represent a potentially important food source for animals at higher trophic levels and thus probably play an important role in energy flow through the system (Plough 1980). Factors influencing the distribution of amphibians include glaciation, the proximity of "source" species for post-glaciation recolonization, present geography and topography, and local climate. In particular, the presence of water or moist conditions is extremely important to amphibians and significantly affects their patterns of distribution at local and regional scales as well as activity patterns and ability to disperse following disturbance (Gregory 1988).

Like fishes, amphibians evolved in environments characterized by episodic and occasionally severe disturbance. Natural disturbance patterns are important in creating and maintaining habitats crucial to their life histories. Periodic fires likely contributed to the amount of down woody debris required by terrestrial amphibians (Russel et al. 1999).

It is difficult to explain the decline of amphibians. The factors most pertinent to the proposed project are: timber harvest, livestock grazing, fire and fire management activities, road and trail development and on- and off-road vehicle use, development and management of recreational facilities and water impoundments, and habitat fragmentation.

Amphibians (particularly salamanders) have complex life histories, characterized by distinct developmental stages. Each stage requires a complex set of habitats connected by suitable migratory corridors. Loss or exclusion from any one of these habitats may cause the species to decline or be extirpated from a local area. Thus, although amphibians evolved in an environment characterized by disturbance, anthropogenic factors such as stream culverts (blocking upstream migration), road system (blocking overland migration), timber harvest (exposing large areas of ground to increased desiccation from thermal radiation) have depleted the capacity of amphibians to re-populate areas once local populations are extirpated.

Amphibians also have suffered substantial regional declines. The Planning Area contains seven species of amphibians for which low population numbers or extremely rare sightings have warranted listing as BLM Sensitive and State Species of Concern. One species, the Coeur d-Alene salamander is currently a candidate for listing under the ESA.

See Table 8 for seven Special Status amphibians in the Planning Area.

| Table 8: Aquatic Special Status Species in the Planning Area | | | |
|---|---------------------|--|---------------------|
| Species Name | Status ¹ | Species Name | Status ¹ |
| Pallid sturgeon <i>Scaphirhynchus albus</i> | LE, S1 | Blue Sucker <i>Cycleptus elongatus</i> | S2, SS |
| Bull trout <i>Salvelinus confluentus</i> | LT, S2 | Pearl Dace <i>Semotilus margarita</i> | S2, SS |
| Westslope cutthroat trout <i>Oncorhynchus clarki lewisi</i> | LR, S2, SS | Sturgeon Chub <i>Macrohybopsis gelida</i> | S2, SS |
| Yellowstone cutthroat trout <i>Oncorhynchus clarki lewisi</i> | S2, SS | Sicklefin Chub <i>Macrohybopsis meeki</i> | S1, SS |
| Arctic grayling (fluvial) <i>Thymallus arcticus montanus</i> | LC, S1 | Coeur d'Alene salamander <i>Plethodon idahoensis</i> | S2,SS |
| Paddlefish <i>Polydon spatula</i> | S1,S2, SS | Canadian toad <i>Bufo hemiphrys</i> | S1 SS |
| Shortnose gar <i>Lepisosteus platstomus</i> | S1, SS | Wood frog <i>Rana sylvatica</i> | SR, SS |
| Northern Redbelly X Finescale Dace <i>Phoxinus eos x P. neogaeus</i> | S3, SS | Spotted frog <i>Rana luteiventris</i> | S4, SS |
| Tailed frog <i>Ascaphus truei</i> | S4, SS | Snapping turtle <i>Chelydra serpentina</i> | S3, SS |
| | | Spiny Softshell turtle | S3, SS |
| ¹ Status <div> <div> Federal Status LE = Listed as Endangered under the ESA LT = Listed as Threatened under the ESA LC = Candidate for Listing under the ESA LR = Under status review for potential listing SS = BLM Sensitive Species: imperiled in at least part of its range and documented to occur within area of BLM jurisdiction. </div> <div> State Status (Montana Only) S1 = Critically imperiled because of extreme rarity or because of some factor(s) in its biology making it especially vulnerable to extinction. S2 = Imperiled because of rarity or because of other factors demonstrably making it very vulnerable to extinction throughout its range. S3 = Either very rare or local throughout its range, or found locally (even abundantly in some locations in a restricted range, or vulnerable throughout its range because of other factors. </div> </div> | | | |

Environmental Consequences - Aquatic Habitat and Species

Aquatic resources could be affected by:

- presence/absence of protective guidelines for aquatic species and habitats;
- changes in wildfire frequency and severity;
- need for more frequent aggressive wildfire suppression;
- intensity and scope of projects.

1. Guidelines for Aquatic Species and Habitat

Key effect: Implementation of Alternative B would facilitate protection of aquatic resources during fuels management planning.

With Alternative A, little guidance for protection of aquatic species, especially amphibians, is provided. Except for

projects where ESA-listed species are present or mandatory terms and conditions apply, fuels management must comply with State-required minimum Stream Management Zone (SMZ) to protect aquatic resources. The SMZ, a 50' no-treatment zone where sideslopes are ≤35 degrees (Montana Dept. of Natural Resources 1995), is intended to limit sedimentation; however, these SMZs are often insufficient to protect key functional elements of aquatic and riparian ecosystems (see review in Quigley et al. 1997). Isolated wetlands, which are important amphibian habitats, receive *no* formal protection. Thus, there would be greater uncertainty for ecological outcomes under Alternative A based on the absence of consistent protection of aquatic resources and reliance on state-required minimum riparian protections.

Guidance under Alternative B would provide greater protection of aquatic species and habitat. Guidance that establishes Riparian Protection Zones (RPZs) would be

incorporated into fuels management projects, where riparian resources receive primary management emphasis, and require analysis of project-related impacts to specific elements of riparian and aquatic function. The configuration of the RPZs are based on widely accepted riparian and aquatic protection strategies (FEMAT (1993), PACFISH (1995), and INFISH (1995)). These RPZs are designed to protect a comprehensive suite of ecological processes, and would protect amphibians and fishes. Alternative B would also require that specific risk analyses at the project scale be conducted for fragmented, at-risk populations (such as isolated populations of genetically pure westslope cutthroat trout) which may be substantially affected or potentially extirpated by both wildfire and fuels management activities. Thus, fewer adverse effects to aquatic resources would likely occur under Alternative B.

2. Severity and Frequency of Wildfire

Key effect: Implementation of Alternative B would reduce severity of wildfire.

Wildfire, by itself, does not pose a particular risk to aquatic biota. Species have evolved in a dynamic and sometimes severe fire regime. Wildfire contributes large woody structure critically important in stream ecosystem function. Many of the habitat features such as deep pools and beaver ponds, extensive riparian wetlands, and saturated floodplains that historically enabled aquatic species to survive during wildfire and to re-colonize following fire have been substantially diminished. In some areas, past management activities have reduced the abundance and quality of those features. Habitat fragmentation by dams, roads, culverts, and dewatering can prevent individuals and populations from escaping wildfire effects and may block re-colonization. Species found in small, montane streams (e.g., westslope cutthroat trout and tailed frog larvae) may be particularly vulnerable to wildfire because these hillslope-constrained systems lack substantial surface flow, moist floodplains, and the associated riparian microhabitats that buffer larger, unconstrained systems from adjacent flames.

Under Alternative A, substantially fewer acres would be treated to reduce fire risk. Remaining high fuel loads would result in more severe wildfires than historically occurred (especially in areas dominated by coniferous forests). Although fire is an important component of aquatic ecosystem function and a natural disturbance element to which native aquatic species are adapted, the severely diminished capacity of native species to survive or escape from fire is a source of substantial risk to the persistence of isolated populations. This has significant implications for the persistence of westslope cutthroat trout across the planning area. These fish have been severely impacted by introgression (interbreeding with exotic species and subsequent loss of substantial portions of the historic diverse genetic resource). Remaining isolated populations are considered critical for maintaining genetically pure stock

for future broodstock should the fish be restored to historic habitats. Many of the remaining genetically pure populations are located in small, isolated stream channels on BLM-managed lands within the area where increased fire risk has been identified (particularly in the Garnet Mountains, managed by the Missoula Field Office).

Fuels management projects under Alternative B would reduce the risk of severe fires that could potentially threaten the survival of populations. Although there are adverse impacts associated with the implementation of the projects (see Section 4, below), carefully planned reduction of risk may be preferable for selected populations without the natural capacity to survive a wildfire.

3. Greater Reliance on Emergency Suppression

Key effect: Reducing wildfire risk and intensity reduces the future need for aggressive emergency suppression.

The risk of severe wildland fire would be greater under Alternative A and there would be more frequent and widespread use of fire suppression. Suppression operations introduce fire retardant, aviation fuel, or lubricants into streams and wetlands; expose soils on steep slopes adjacent to streams during fire line construction; damage riparian vegetation and soils from use of heavy equipment off of established roads; reduce natural streamflow during drafting and pumping; and damage vegetation and soils if fire camps are established in or adjacent to sensitive riparian areas. Although minimum-impact suppression techniques (M.I.S.T.) and "light-on-the land" techniques have been developed, the primary objective during emergency suppression is to protect life and property. Because species and habitat protection is logically placed below protection of human life and property, there is no assurance that MIST techniques can and will be followed in all situations.

Alternative B would reduce the severity of fires and the use of aggressive suppression operations on treated areas. Fuels projects would be designed and implemented in a "non-emergency" manner that minimizes impacts to aquatic resources.

Although wildfires may still occur in areas where hazardous fuel loads have been reduced, fires that may occur are expected to be predominately ground fires rather than crown fires. Ground fires are easier to control with lower-impact suppression methods (such as hand-built fire line) that are less likely to adversely affect aquatic resources. In contrast, the crown fires associated with heavier fuel loads often require suppression techniques likely to have greater adverse impacts to aquatic habitats and species (e.g., retardant drops or heavy machinery to construct the wide lines required to contain them). Thus, in the long term, the need for suppression and the concurrent impacts of aggressive emergency suppression should be reduced under Alternative B.

4. Intensity and Scope of the Projects

Key Effect: More acres would be treated with fuels projects under Alternative B.

The nature of fuel treatments would be similar under both alternatives. Mechanical treatments would include pre-commercial and commercial thinning, commercial timber harvest, overstory reduction, and construction of fuel breaks. Chemical treatments would be used for noxious weed control. Permanent water sources would be developed to support future fire suppression. Roads would be constructed and re-located. The direct and indirect effects of these activities are summarized below.

- General Vegetation Management: Meehan (1991) reviews the effects of timber harvest and vegetation management on aquatic resources. In summary, removal of vegetation from hillslopes removes canopy cover and increases soil loss, resulting in increased stream temperatures and reduced supplies of large down wood. Timber harvest in these areas may alter streamflow regimes, accelerate surface erosion and mass wasting, resulting in increased sediment delivery and turbidity in streams. Small streams are likely to be more affected by activities on adjacent hillslopes than large streams because smaller channels respond more quickly to changes in hydrologic and sediment regimes, and because riparian vegetation is a more dominant factor in terms of organic inputs and shading (ICBEMP Vol 2).

Removal of vegetation to reduce future fuel loads may be accomplished with minimal impacts in some areas, but in others, sensitivity to ground disturbance from loss of vegetation can cause increased erosion, compacted soils, and a loss of nutrients (USDA 2000, Beschta et al. 1995). Fuels management activities that increase the probability of chronic sediment inputs to aquatic systems may pose greater threats to fish, amphibians and aquatic ecosystem integrity than natural events associated with undesired forest stand condition (Frissell and Bayles, 1996).

- Road Construction and Maintenance: Impacts of building forest roads have been documented by Reid and Dunne (1984), Chamberlain et al. (1991), and Furniss et al. (1991). Roads contribute more sediment to streams than other land management activity and most sediment from vegetation management activities is related to roads and road building and associated increases in erosion rates (Gibbons and Salo 1973, Swanson and Dyrness 1975, Swanson and Swanson 1976, Beschta 1978, Gardner 1979, Reid and Dunne 1984, Meehan 1991, Rhodes et al 1994).

One mile of new road construction per decade would be anticipated with Alternative A compared to three miles of new roads under Alternative B. These would be rehabilitated after use.

- Prescribed Fire: Although uncommon, improperly planned or “escaped” prescribed fire may burn riparian vegetation, reducing shade, exposing streamside soils, etc. Prescribed fires conducted in the spring (when drainage-bottoms are still snow covered) helps to protect streamside vegetation and soils, but may adversely affect amphibians. Many of Montana’s amphibians are most active on the ground surface during moist periods in the spring (see Turner 1957; Beneski et al. 1986; Hill 1995). As these animals migrate between terrestrial and aquatic habitats they may be particularly susceptible to fire because many migrate in mass and most remain closer to the ground surface where they may be more easily reached by flames. However, fire may also have positive indirect effects by restoring natural openings that allowed terrestrial amphibians to bask and forage (Kirkland et al. 1996). In addition, removal of forest trees immediately adjacent to wetlands may enhance the length of time ephemeral wetlands are present by reducing evapotranspiration (Russell et al. 1999b) and may reduce the length of the larval period of many amphibians by increasing solar radiation, thereby ensuring that metamorphosis takes place prior to pond drying (Russell et al. 1999b).

An estimated 1-2 percent of prescribed fires “escape” bureau-wide (Al Carrier, NIFC, personal conversation, 2003).

- Chemical Treatment: The effects of chemical treatment of noxious weeds are summarized in Norris et al (1991). The introduction of a variety of chemicals into streams and wetlands may result in acute and chronic toxicity to aquatic species. Residents of small streams, springs, and wetlands are more likely to be affected because these habitats contain less water to dilute the chemical, and are less easily seen from the air (and avoided) during aerial application. Little if any research has been done on the effects of herbicides on amphibians in Montana/Dakotas, but it is expected that amphibians would be most affected since the habitat-types they often occupy (i.e., small streams and seeps) are less efficient at diluting herbicide concentrations, and chemicals can more easily penetrate the breathable, permeable skin of amphibians.

Following label directions for chemical use, BLM Manual 9011, BLM Handbook H9011-1 Chemical Pest Control Guidance, and the Riparian Protection Zone guidance (under Alternative B, See section 2.5.3.1) would reduce the likelihood of introducing chemicals

that may be toxic to aquatic and amphibian species into streams and wetlands.

Protection of life and property would have priority over resource objectives relating to aquatic resources and species during fire suppression; and maintenance of aquatic habitats and species are not included in “Required Outcomes” for all fuels reduction projects. Some projects involve multiple treatments of the same area, repeated entry into watersheds, and the maintenance of a road-based infrastructure. The negative effects of wildland fire may be severe, but wildfire represents an acute and isolated disturbance. “Refuge-taking” by aquatic species is effective for survival during periodic, short-lived disturbance (e.g. wildfire), but negative effects from road construction and related management can be chronic or persistent, with effects lasting for decades (Poff and Ward 1990, Rieman and Clayton, 1997). Alternative B guidelines are designed to reduce the risk of these impacts.

The primary difference between the alternatives is the magnitude of treatments planned. Although Alternative B would more than double the treatment acres, the presence of protective guidelines would reduce potentially greater impacts. Specific design features of Alternative B would be incorporated at the project scale to reduce impacts to particularly sensitive populations to the non-significant level.

Conclusion (Aquatic Habitats and Species)

Under Alternative A, aquatic organisms (especially isolated, depressed populations in smaller streams) would be at greater risk from severe wildfire because severe wildfire would be more likely. A lower level of fuels projects would occur, reducing the risks from management actions as compared to Alternative B. However, during fuels projects that did occur, a lower level of protection would be provided to aquatic species because projects would rely on existing RMP decisions and state guidance.

Under Alternative B, the impacts of severe wildland fire and future needs for emergency wildfire suppression would be reduced. The potentially greater risks associated with higher levels of fuels treatment would not reach significant levels because of the guidelines included in the alternative. These design features also require that measures be included in project plans to reduce impacts to isolated, depressed populations of species that are at particular risk of extinction to non-significant levels.

3.7 Terrestrial Species and Habitat (except for federally listed Threatened, Endangered, and Proposed Species)

Affected Environment (Terrestrial Species and Habitat, including SSS)

Plant communities on many western rangelands are no longer pristine and do not support pristine populations of wildlife species. Many rangeland plant communities have herbaceous weeds or a higher ratio of woody to herbaceous perennial vegetation than under pristine conditions. These vegetation conditions may favor certain wildlife species, such as chukar partridge, which utilize cheatgrass for food (Weaver and Haskell 1967), and disfavor other species, such as the pronghorn antelope, which require mixed-plant communities rather than those plant communities dominated by a few woody or herbaceous species (Yoakum 1975). In general, the greater the diversity of the plant community, the greater the diversity of the associated animal community (Gysel and Lyon 1980).

Special Status Species

This section analyzes candidate species, BLM sensitive species, and State listed species. The Biological Assessment (BA) completed for consultation with US Fish and Wildlife Service contains an analysis for federally listed threatened, endangered, and proposed species, as well as proposed and designated critical habitat. These findings are summarized in this document, and the Biological Assessment (BA).

Designated BLM sensitive wildlife species include 26 species of birds, 14 species of mammals, and 7 species of reptiles and amphibians. A complete list of BLM Sensitive Species is summarized in Table 9.

Environmental Consequences (Terrestrial Species and Habitat, including SSS)

Prescribed Fire: Prescribed fire would generally change vegetation communities to lower seral (earlier succession) stages. Forestlands would change to forest/grass understory and treated shrublands would change to grass/forb communities. Wildlife adapted to lower seral stage habitat would benefit and possibly increase. Species that reproduce and feed in grass/forb vegetation such as ground squirrels, elk, mountain plover, and species of birds are examples of wildlife that would benefit. Refer to Table 10 for a brief listing of wildlife adapted to different habitats. For example, in areas occupied by elk and mule deer, elk would be favored where vegetation moves toward a higher percent composition of grass. Big game populations would move toward stability in the long term, but occupy different proportions of habitats .

Table 9: BLM Sensitive Species within the analysis area

| Species Common Name (Scientific Name) | Field Offices* In Range (R) and with Habitat Present (H) | Field Offices* with documented occurrence |
|--|---|---|
| Bairds sparrow (<i>Ammodramus bairdii</i>) | R - all but MT 100 H - 010, 020, 030, 040, 060, 064, 070, 090, 92 | MT 010, 020, 030, 040, 060, 064, 090, 092 |
| Black-backed woodpecker (<i>Picoides arcticus</i>) | R - MT 010, 020, 050, 060, 070, 100 H - same as above | MT 020, 050, 060, 070, 100 |
| Black Tern (<i>Chlidonias niger</i>) | R - all Habitat - all | MT 020, 030, 040, 050, 060, 064, 090, 092, 100 |
| Boreal owl (<i>Aegolius funereus</i>) | R - MT 010, 050, 060, 070, 100 H - same as above | MT - 050, 060, 100 |
| Burrowing owl (<i>Athene cunicularia</i>) | R - all H - all | All except MT100 |
| Canvasback duck (<i>Aythya valisineria</i>) | R - all H - all | All |
| Columbian sharp-tailed grouse (<i>Tympanuchus phasianellus</i>) | R - MT 050, 070, 100 H - same as above | MT 050, 070, 100 |
| Common loon (<i>Gavia immer</i>) | R - MT 020, 030, 040, 050, 060, 064, 070, 100 H - same as above | MT 020, 040, 050, 060, 064, 100 |
| Dickcissel (<i>Spiza Americana</i>) | R - MT 010, 020, 030, 040, 060, 064, 090, 092 H - same as above | MT 020, 040 |
| Ferruginous hawk (<i>Buteo regalis</i>) | R - all H - all | All, except MT100 |
| Flammulated owl (<i>Otus flammeolus</i>) | R - MT 010, 050, 060, 070, 100 H - same as above | MT 070, 100 |
| Great gray owl (<i>Strix nebulosa</i>) | R - MT 010, 050, 060, 070, 100 H - same as above | MT 050, 060, 070, 100 |
| Hairy woodpecker (<i>Picoides villosus</i>) | R - all H - all | All |
| Harlequin duck (<i>Histrionicus histrionicus</i>) | R - MT 010, 050, 060, 070, 100 H - MT 050, 070, 100 | MT 050 |
| LeConte's sparrow (<i>Ammodramus leconteii</i>) | R - 010, 020, 030, 040, 060, 064, 090, 092 H - same as above | MT 020 |
| Loggerhead shrike (<i>Lanius Ludovicianus</i>) | R - all H - all | all |
| Long billed curlew (<i>Numenius americanus</i>) | R - all H - all | all |
| Northern goshawk (<i>Accipiter gentiles</i>) | R - all H - 010, 020, 040, 050, 060, 090 | MT 020, 040, 050, 064, |
| Peregrine falcon ¹ (<i>Falco peregrinus</i>) | R - all H - MT 010, 020, 050, 060, 064, 070, 100 | MT 010, 020, 050, 060, 070, 100 |
| Pileated woodpecker (<i>Dryocopus pileatus</i>) | R - MT 010, 050, 060, 070, 100 H - MT 010, 050, 060, 070, 100 | MT 050, 100 |
| Sage grouse ² (<i>Centrocercus urophasianus</i>) | R- all H- all | MT 010,020, 030, 040, 050, 060, 064, 070, 090, 092 |
| Sage sparrow (<i>Amphispiza belli</i>) | R - MT 010, 020, 040, 050, 060, 064, 070, 090, 092 H - same as above | MT 020, 040, 050 |
| Swainson's hawk (<i>Buteo swainsoni</i>) | R - all H - all | all |

Table 9: BLM Sensitive Species within the analysis area (continued)

| Species Common Name (Scientific Name) | Field Offices* In Range (R) and with Habitat Present (H) | Field Offices* with documented occurrence |
|--|--|---|
| Three-toed woodpecker (<i>Picoides tridactylus</i>) | R - MT 010, 050, 060, 070, 100 H - MT 010, 050, 060, 070, 100 | MT 010, 050, 060, 070, 100 |
| Trumpeter swan (<i>Cygnus buccinator</i>) | R - all H - all | MT 010, 020, 040, 050, 060, 064, 070, 100 |
| White-faced ibis (<i>Plegadis chihi</i>) | R - all H - all | MT 020, 050, 060, 062, 092 |
| Black-tailed prairie dog ³ (<i>Cynomys ludovicianus</i>) | R - MT 010, 020, 030, 040, 050, 060, 064, 070, 090, 092 H - same as above | MT 010, 020, 030, 040, 060, 064, 070, 090, 092 |
| Fisher (<i>Martes pennati</i>) | R - MT 010, 050, 060, 070, 100 H - same as above | MT 050, 060, 070, 100 |
| Meadow jumping mouse (<i>Zapus hudsonius</i>) | R - MT 010, 020, 030, 040, H - MT 010, 020, 030, 040, 060, 064, 090, 092 | MT 010, 020, |
| Merriam's shrew (<i>Sorex merriami</i>) | R - all H - MT 010, 020, 030, 040, 070, 064, 090, 092 | MT 010, 020, 060, 064, |
| North American wolverine (<i>Gulo gulo luscus</i>) | R - 010, 050, 060, 064, 070, 100 H - same as above | MT 010, 050, 060, 064, 070, 100 |
| Northern Bog Lemming (<i>Synaptomys borealis</i>) | R - MT 050, 060, 070, 100 H - same as above | MT 050, 060, 100 |
| Preble's Shrew (<i>Sorex preblei</i>) | R - all H - all | MT 010, 020, 060, 070, |
| Pygmy rabbit (<i>Brachylagus idahoensis</i>) | R - MT 050, 070 H - 050, 070 | MT 050 |
| Spotted bat (<i>Euderma maculatum</i>) | R - MT 010, 020, 050 H - MT 010, 020 | MT 010 |
| Swift fox (<i>Vulpes velox</i>) | R - MT 010, 020, 030, 040, 050, 060, 064, 070, 090, 092 H - same as above | MT 010, 020, 030, 040, 060, 064, 070, 090, 092 |
| Townsend's big-eared bat (<i>Plecotus townsendii</i>) | R - all H - all | MT 010, 020, 040, 050, 060, 064, 070, 090 |
| Western spotted skunk (<i>Spilogale putorius</i>) | R - MT 010, 020, 040, 050, 070, 100 H - same as above | MT 010, 040, 050, 070, 100 |
| White-tailed prairie dog (<i>Cynomys leucurus</i>) | R - MT 010 H - MT 010 | MT 010 |
| Woodland caribou (<i>Rangifer tarandus caribou</i>) | R - MT 100 H - MT 100 | none |
| Snapping turtle (<i>Chelydra serpentina</i>) | R - all H - all (except 050) | MT 010, 020, 030, 040, 100 |
| Spiny softshell turtle (<i>Trionyx spiniferus</i>) | R - MT 010, 020, 050, 060, 064, 070, 090, 092 H - MT 010, 020, 060, 064 | MT 010, 020, 060, 064, |
| Canadian toad (<i>Bufo hemiopharys</i>) | R - 030, 060, 064, 090, 092 H - same as above | none |
| Coeur d'Alene salamander (<i>Plethodon idahoensis</i>) | R - MT 050, 100 H - MT 050, 100 | MT 050 |
| Spotted frog ⁴ (<i>Rana pretiosa</i>) | R - MT 010, 050, 060, 064, 070, 100 H - same as above | MT 050 |
| Tailed frog (<i>Ascaphus truei</i>) | R - MT 050, 060, 064, 070, 090, 100 H - MT 050, 060, 070, | MT 050, 060, 070, 090, 100 |

Table 9: BLM Sensitive Species within the analysis area (continued)

| Species Common Name (Scientific Name) | Field Offices* In Range (R) and with Habitat Present (H) | Field Offices* with documented occurrence |
|--|---|--|
| Wood frog (<i>Rana sylvatica</i>) | R - all H - all (except 050) | MT 040 |
| Arctic grayling (fluvial population) ⁵ (<i>Thymallus arcticus</i>) | R - MT 050, 070, 100 H - MT 050, 070, 100 | MT 050, 070 |
| Blue sucker (<i>Cycleptus elongates</i>) | R - MT 020, 090, 092 H - MT 020, 090, 092 | MT 020, 092 |
| Northern redbelly X Finescale dace (<i>Phoxinus eos X Phoxinus neogaeus</i>) | R - MT 020, 092 H - 020, 092 | MT 020, 092 |
| Paddlefish (<i>Polyodon spathula</i>) | R - MT 010, 020, 030, 040, 064, 090, 092 H - MT 010, 020, 030, 040, 060, 064, 090, 092 | MT 020, 040, 064, 090 |
| Pearl dace (<i>Margariscus margarita nachtriebi</i>) | R - MT 020, 040 H - MT 020, 040 | MT 020, 040 |
| Shortnose gar (<i>Lepisosteus platostomus</i>) | R - MT 020, 030, 040, 090, 092, H - same as above | MT 020, 092 |
| Sicklefin chub (<i>Macrhybopsis (Hybopsis) meeki</i>) | R - MT 040, 090, 092 H - MT 040, 090, 092 | MT 040, 090, 092 |
| Sturgeon chub (<i>Macrhybopsis (Hybopsis) gelida</i>) | R - MT 020, 040, 060, 064, 090, 092 H - same as above | MT 020, 040, 092 |
| Westslope cutthroat trout (<i>Oncorhynchus clarki lewisi</i>) | R - MT 050, 060, 070, 100 H - same as above | MT 050, 060, 070, 100 |
| Yellowstone cutthroat trout (<i>Oncorhynchus clarki bouvieri</i>) | R - 010, 020, 050 H - 010, 020, 050 | MT 010, 050 |

Comments

¹recently delisted from Endangered

²interim BLM sensitive species (pending list revision)

³federal Candidate species

⁴this should be the Columbia spotted frog (*Rana luteiventris*)

⁵Federal Candidate

**Field Office Codes:*

MT 010 - Billings

MT 020 - Miles City

MT 030 - North Dakota

MT 040 - South Dakota

MT 050 - Dillon

MT 060 - Lewistown

MT 064 - Havre

MT 070 - Butte

MT 090 - Malta

MT 092 - Glasgow

MT 100 - Missoula

Effects on wildlife from fire management depend on the timing, intensity, and vegetative species burned. Treatments that cause changes in wildlife forage and habitat, may be beneficial or negative, depending on the species.

Prescribed fires may change forage quality and quantity, intersperse new feeding areas with areas providing cover, and rejuvenate decadent browse plants. Changes in vegetation structure and dispersion of burned areas are key factors when planning prescribed fires for wildlife purposes.

Many different wildlife (vertebrate) responses to fires have been reported. Fire effects on wildlife vary with (1) animal species complex, (2) mosaic of habitat types, (3) size and shape of fire-created mosaic, (4) fire intensity, (5) fire duration, (6) fire frequency, (7) fire location, (8) fire shape, (9) fire extent, (10) season of burn, (11) rate of vegetation

recovery, (12) species that recover, (13) change in vegetation structure, (14) fuels, (15) sites, and (16) soils. Other factors that alter fire effects on vegetation and soils also influence wildlife responses to burning.

Fires kill the less mobile birds and animals, alter environments, and influence postfire habitat succession (Lyon et al. 1978). Killing vertebrates by prescribed burning is rare (Lyon et al. 1978). The most exposed habitat sites are dry, exposed slopes, hollow logs with a lot of exposed wood, burrows less than 5 inches deep, lower branches of trees and shrubs, and poorly insulated underground/ground nesting areas (Lawrence 1966, as cited by Peek 1986). Effects of prescribed burning on ground cover depend on fire severity. Less severe fires on wet sites would remove less cover than more severe fires on dry sites.

Fire may create habitat diversity by recreating lost or degraded habitats for indigenous species, and by allowing the reintroduction of extirpated species when habitat degradation was significant to their extinction. Immediate postfire conditions raise light penetration and temperatures on and immediately above and below soil surfaces and can reduce soil moisture (Lyon et al. 1978).

Burning cover and removing trees, shrubs, and forage will modify habitat structure (Lyon et al. 1978, Peek 1986). The loss of small ground cover and charring of larger branches and logs (with diameters greater than 3 inches) can affect small animals and birds. Early, vigorous vegetation growth immediately after a fire alters feeding and nesting behaviors (Lyon et al. 1978). Postfire plant and animal succession effects creating seral and climax mosaics in habitat cannot be generalized in their effects on wildlife (Lyon et al. 1978, Peek 1986). Adverse impacts can be lessened if the treatment avoids the bird nesting season and other critical seasons when loss of cover would be critical to wildlife; for example, during critical reproductive periods and prior to severe winter weather conditions.

No significant changes in small mammal species were observed for one year postburn in sagebrush-grassland (Frenzel 1979, as cited by Starkey 1985), but shrews and other species with narrow niches require patches of unburned vegetation to sustain populations, although total small mammal numbers may not be altered (McGee 1982). Habitat changes induced by fire may temporarily decrease the number and diversity of small mammals in sagebrush vegetation (Klebenow and Beall 1977). By increasing habitat diversity, associated bird communities may be increased by burning (Starkey 1985).

Low fire frequencies may be useful in maintaining productive habitat for sage grouse (Peek 1986). Large intense fires affect other bird species, such as yellowthroat, yellow-breasted chat, Traill's fly-catcher, and yellow-billed cuckoo, because they require dense shrub cover (McAdoo and Klebenow 1978). Conversely, sparrow species require relatively less shrub cover (McAdoo and Klebenow 1978). Because chuckar partridge rely heavily on cheatgrass, fire could conceivably be used to improve the habitat for this species (Wright and Bailey 1982). Prescribed burning in these types also may improve the habitat for higher numbers of sheep, pronghorn antelope, and mule deer (Klebenow 1985). Fire suppression has favored the expansion of mule deer populations in some sagebrush areas because of the increased forage or cover (Crouch 1974). In areas of limited rainfall and forage production the thermal cover provided by sagebrush may be critical to deer and other wildlife survival (W. A. Molini, pers. comm. 1990). Big sagebrush is a valuable forage plant on critical deer winter range and should be protected from fire in these areas (Vallentine 1980).

While complete type conversion of juniper sites to grassland may reduce wildlife diversity, creating a mosaic of successional stages with prescribed burning can benefit wildlife (Severson and Medina 1984). Spotty burning would favor the greatest diversity of rodent and bird species (Wright and Bailey 1982). Fire suppression has favored expansion of mule deer populations in some juniper areas because of the increased forage or cover. Deer and elk use of burned juniper areas depends on postfire successional stages (Stager and Klebenow 1987), because burning can eliminate some important deer browse species (McCulloch 1969). An important factor in the degree of use of burned juniper habitats by deer and elk is the interspersed of burned habitats, which provide food, and unburned sites, which provide thermal and hiding cover. Old growth juniper stands may offer unique and valuable wildlife habitats, adding to the variety within juniper stands. When planning site-specific treatments, it should be recommended that these old growth communities be left standing as islands and edge communities to the prescribed burning areas.

Fire can improve habitat for some species of prairie wildlife. Dabbling ducks and sharp-tailed grouse production increased on burned grassland as compared to undisturbed grassland in North Dakota (Kirsch and Kruse 1972). Prescribed burning also improved upland plover production. Fires that burn shrubs destroy songbird nesting habitat (Renwald 1977). Periodic burning is desirable to maintain ideal prairie chicken habitat in tallgrass prairie, but burned areas may not be preferred habitat for sharp-tailed grouse for several years postfire (Wright and Bailey 1982).

Fire alters grassland habitat, by reducing shrub cover (Samson and Knoph). Reduced shrub cover could enhance areas for prairie dogs (Player and Urness, 1982), but the loss of sagebrush habitat and the threat of exotic grass introduction appear to make fire an undesirable tool for prairie dog habitat management."

Fire effects on wildlife in coniferous forests depend on ecological relationships and animal habitat needs. Ground fires have little direct influence on tree squirrels and may even be favorable by perpetuating ponderosa pine communities (Wright and Bailey 1982). Ground squirrels initially decreased in burned ponderosa pine communities but increased later as early successional advances were made (Lowe et al. 1978). Fire would probably adversely affect chipmunks in those communities where drier conditions prevail, but chipmunks may increase postburn on more moist sites (Lowe et al. 1978, Wright and Bailey 1982). Total bird numbers increased initially after burning in ponderosa pine communities but fell to below prefire levels later, although some individual species responded in an opposite manner (Lowe et al. 1978).

In one study, both deer and elk decreased their use of areas immediately following a burn but quickly increased levels

of use as compared to control plots. Benefits to deer and elk from fires in these types are generally related to increases in understory vegetation (Leege and Hickey 1971, Severson and Medina 1983). Burns in Douglas-fir and ponderosa pine communities improved forage palatability to mule deer (Keay and Peek 1980). Prescribed fire also can improve winter forage for mountain sheep (Hobbs and Sporwart 1984). Prescribed fire can be used to rejuvenate old aspen stands, increasing habitat for moose, elk, deer, ruffed grouse, and snowshoe hare, all of which depend on the forage or cover produced in a young aspen community (DeByle 1985).

Mechanical Treatments: About 123,000 acres more would be mechanically treated with Alternative B than with Alternative A. Because mechanical treatments have the advantage of being highly selective, impacts to wildlife can be minimized through properly designed treatment plans developed in site-specific environmental analyses. These treatments would benefit wildlife that adapt to lower seral stages of vegetation referred to in prescribed fire. See Table 10 for a general list of wildlife habitat preferences. Wildlife species diversity may be reduced in the treatment areas, but the habitat edges created by the treatments will have increased wildlife species diversity.

Mechanical methods can result in soil compaction, damaging the subterranean habitat used by burrowing animals. In general, mechanical treatments can be beneficial for wildlife if the treatment areas are arranged in strips and patches and if methods are selected that increase browse and forage availability.

Chemical Weed Treatments: Chemical treatments have traditionally been applied most frequently to decrease woody plant cover and increase the production of grasses. The most common objective of chemical treatments in the fuel treatment areas is to control noxious weed infestations. Most of the noxious weed infestations will be small isolated populations that would be spot treated on the ground using vehicles or manual application devices. Large area chemical applications, with aircraft or vehicles, would only be used occasionally in extreme large area weed infestations.

The control of broadleaf woody plants and noxious weeds with selective herbicides often results in the control of associated broadleaf forbs. Both categories of vegetation have plant species that may be important food for many different wildlife species. The spraying of 185,000 acres for weeds (Alternative B) would reduce habitat for wildlife species dependent on some broadleaf forbs and affected shrubs in the short term (1-2 years). Examples of species associated with broadleaf forbs would be sage grouse, ground squirrels, and prairie dogs. Species associated with shrubs, such as sagebrush or bitterbrush, are sage grouse, mule deer, white-tailed deer, antelope, and several species of passerine birds.

The impacts to the wildlife will usually be greater by allowing noxious weeds to displace native habitat and create a monoculture of weeds. A monoculture of weeds reduces habitat and species diversity.

BLM Sensitive Species

Effects from the proposed fire management activities and/or fuels reduction treatments to BLM sensitive species of wildlife depend on the type of activities or treatments (e.g., wildfire control activities, prescribed burn, mechanical treatment, chemical treatment), timing, duration, intensity, and habitat type or vegetative community treated. Treatments that cause shifts or changes in the vegetative community, changes in the seral stage of the plant association, or changes in the structural integrity of the habitat, may have beneficial or negative effects, depending on the species considered.

Wildland Fire Management:

Management activities resulting from wildfire management would be similar for both alternatives. These activities would include all suppression actions and the associated activities and infrastructure necessary to support the suppression effort. Activities such as fire camps, helibases, helispots, opening of closed roads, creation of temporary roads, development or improvement of water sources (pump chance), staging areas, are some of the activities that may occur.

Direct and indirect effects to BLM sensitive species could result from these actions/activities. These effects would, for the most part, be limited to insignificant, short-term negative effects due to disturbance and possible displacement of individuals.

There would be some risk of direct take on individual animals from vehicle collisions, aerial suppression (retardant or water drops), heavy equipment operations, and human activities. These effects would generally be limited to juvenile individuals or the less mobile species such as amphibians, reptiles, and small mammals. There could also be some risk of long-term indirect effects from loss of essential habitat. Destruction of courting (grouse leks), nesting, denning, communal roosts, or other habitat necessary to maintain or improve reproductive levels could result. Conservation and protection measures should be incorporated into activity plans to mitigate these potential effects.

Prescribed Fire:

Comparison of Alternative A and B for effects to BLM sensitive species from prescribed fire finds no significant difference for potential impacts on grasslands or shrublands. When compared with the total acres of each cover type available on BLM administered lands, the differences between Alternative A and B are negligible.

| Table 10: Example ¹ of Wildlife Life-forms/Habitat Requirements | | | |
|--|--|-----------------------------|---|
| Reproduces | Feeds | No. of Species ¹ | Examples |
| In water | In water | 1 | bullfrog |
| In water | On the ground, in bushes, and/or in trees | 9 | long-toed salamander, western toad, Pacific treefrog |
| On the ground around water | On the ground, and in bushes, trees and water | 45 | common garter snake, killdeer, western jumping mouse |
| In cliffs, caves, rimrock and/or talus | On the ground or in the air | 32 | side-blotched lizard, common raven, pika |
| On the ground without specific water, cliff, rimrock, or talus association | On the ground | 48 | western fence lizard, dark-eyed junco, elk |
| On the ground | In bushes, trees, or the air | 7 | common nighthawk, Lincoln's sparrow, porcupine |
| In bushes | On the ground, in water, or the air | 30 | American robin, Swainson's thrush, chipping sparrow |
| In bushes | In trees, bushes, or the air | 6 | dusky flycatcher, yellow-breasted chat, American goldfinch |
| Primarily in deciduous trees | In trees, bushes, or the air | 4 | cedar waxwing, northern oriole, house finch |
| Primarily in conifers | In trees, bushes, or the air | 14 | Golden-crowned kinglet, yellow-rumped warbler, red squirrel |
| In conifers or deciduous trees | In trees, in bushes, on the ground, or in the air | 24 | goshawk, evening grosbeak, hoary bat |
| On very thick branches | On the ground or in water | 7 | great blue heron, red-tailed hawk, great horned owl |
| In own hole excavated in tree | In trees, in bushes, or on the ground, or in the air | 13 | common flicker, pileated woodpecker, red-breasted nuthatch |
| In a hole made by another species or in a natural hole | On the ground, in water, or in the air | 37 | wood duck, American kestrel, northern flying squirrel |
| In a burrow underground | On the ground or under it | 40 | rubber boa, burrowing owl, Columbian ground squirrel |
| In a burrow underground | In the air or in the water | 10 | bank swallow, muskrat, river otter |
| | Total | 327 | |

¹ Species assignment to life-form is based on predominant habitat-use patterns. Based on Thomas et al 1979, Blue

Potential effects resulting from prescribed burning in the grassland or shrubland cover types could include direct effects resulting in mortality of individuals as well as disturbance and displacement of individuals.

Some immature and less mobile animals unable to escape the effects of smoke and fire may perish. Others may become separated from the adults and succumb either to the effects

of the fire or to indirect effects from starvation or predation. Certain species may be inherently more susceptible to mortality due to more sedentary lifestyle or small size and inability to cover long distances. Timing burns to avoid risk to immature animals and design of burns to avoid high potential habitat for sensitive species that may be unable to escape the effects of a burn would be important conservation measures to incorporate into burn prescriptions.

Displacement of individuals would generally be short-term in nature unless the treatment significantly changes the plant association (shifts to an earlier succession stage), shifts the seral stage of the plant community, changes the composition of plant species, or significantly alters the structure of the habitat. Any of these changes in the vegetative conditions could result in long-term habitat modification that would make the area (stand, patch, watershed) unsuitable for an indeterminate time for certain species. This shift in conditions could also make the area more suitable for some species.

Treatment of grassland cover types would generally not cause long-term changes to the plant association, shift the seral stage, or significantly change the composition of plant species. Grassland species are generally more resilient and, having adapted to fire, recover fairly quickly if consideration is given to timing and intensity of burns.

Shrubland species are more variable in their response to fire. Many shrub species (basin big sage, Wyoming big sage, black sage, mountain mahogany, shadscale) do not recover from burning by means other than regeneration from seed. This can require 10 years or more and may leave a stand altered from preburn conditions. Based on site specific environmental analysis, projects would not be recommended where burning these vegetative types is anticipated to cause long-term effects on wildlife habitat.

Other shrub species, (three-tip sagebrush, rabbit brush, snowbrush) resprout after fire and recover more quickly. Burning of these types may have short-term negative effects but long-term beneficial effects by rejuvenating the stand and making the vegetation more productive, more palatable, and/or nutritious (if used as a forage).

Burning of shrublands can also alter the structure of the stand. Large, decadent stands of basin big sagebrush (*Aremesia tridentatatridentata*) may provide excellent nesting conditions for certain species of passerine birds (Brewer's sparrow) but very poor conditions for sage grouse brooding habitat. Burning might improve the habitat conditions for sage grouse brooding but make it totally unsuitable for passerine nesting.

The potential effects to species dependant on forestlands would be essentially the same as those effects to the grassland and shrubland species. However, due to a larger proportion of the cover type being proposed for treatment, effects would be proportionately greater. There is also an inherently greater likelihood for loss of structure and changes in plant composition due to the greater diversity of plant species in a forested community. If treatment significantly changes the plant association (shifts to an earlier succession stage), shifts the seral stage of the plant community, changes the composition of plant species, or significantly alters the structure of the habitat it would generally constitute a long-

term effect due to the longer timelines for regeneration of the forest community types.

When the effects from prescribed burning are considered alone, neither Alternative A nor B pose significant risks to populations of sensitive species. The magnitude of proposed treatments in both alternatives is minimal in relation to the availability of habitat on BLM administered lands. However, when considered along with past, present, and future activities the cumulative effects may pose substantial risks to isolated populations of certain species.

This is especially true if one considers effects from probable wildfire. If wildfire burned areas of essential habitat for certain species, nearby unburned patches of suitable habitat would be infinitely more important. To ensure persistence of certain species, adequate patch size and spatial arrangement of suitable habitat must be maintained

This preplanning would allow for the analysis of effects of proposed fuels treatment projects at a larger landscape scale than just the project area and compare the proposed action in relation to any recent wildfire events. This would enable decision makers to ensure their actions would not lead sensitive species toward federal listing.

Mechanical Treatments:

Mechanical treatments pose similar threats to sensitive species as prescribed burns except the risk of direct mortality is much lower. Mechanical treatments have the advantage of being a more "controlled" treatment and thereby being more capable of minimizing direct effects if a sensitive species or previously unknown key habitat is discovered. It is far more likely (as compared to prescribed burning) that mechanical activities could be modified to avoid a nest or den site or to move activities from an area where a sensitive species is discovered.

Mechanical treatments could still cause disturbance and displacement both from direct effects of the treatment activities as well as changes in habitat conditions. As with prescribed burning, any changes in the vegetative conditions could result in long-term habitat modification that would make the area (stand, patch, watershed) unsuitable for an indeterminate time for certain species. This shift in conditions could also make the area more suitable for certain other species.

Comparison of alternatives for effects to BLM sensitive species from mechanical treatments finds an increase in potential impacts from Alternative A to Alternative B. However, when compared to the total BLM administered acres, even the upper limit of treatments under Alternative B represents less than 2 percent of the total BLM acreage in Montana and the Dakotas.

This comparison carries through when the proposed

treatments by the various cover types (grass, shrubs, forest) are compared for Alternative A and B. The potential effects for all three cover types are far greater under Alternative B due to the significant increase in acres proposed for treatment.

Although Alternative B represents substantial increases in acres proposed for treatment as compared to Alternative A, when compared in context with the total acres under BLM administration of each cover type, even the upper level of treatment would be insignificant. The higher level of treatment under Alternative B represents 0.3 percent of the grasslands, 1.5 percent of the shrublands and 10.1 percent of the forestland administered by BLM.

Beneficial effects would result from mechanical treatments for some sensitive species. Removal of encroaching tree species from shrub and grassland communities would maintain the habitat over time to benefit species dependent on those communities. Reducing stocking levels of forested stands by removal of seedling, sapling, and pole size understory vegetation would reduce the risk of stand replacement fires which in turn would maintain the forest stands over time to benefit species associated with forestland communities.

Chemical Weed Treatments:

Chemical treatments are planned in support of other fuels reduction treatments. The objective of chemical treatments is to control noxious weed infestations that may exist prior to the primary fuels treatment or result post treatment. In some cases where there is a significant weed component in a proposed fuels treatment area, chemical control may be used both prior to and post fuels treatment projects. Most chemical treatments will be on relatively small isolated populations that would be spot treated using ground vehicles or manual application devices.

Chemical treatments would be used on 3,500 acres in Alternative A and 185,000 acres in alternative B. Although the specific locations of these treatments have not been identified, acres of chemical weed treatments would have nearly a complete overlap with other types of fuels reduction treatments. Thus, effects from chemical treatments would not contribute additional acres of disturbance but would contribute to the cumulative impacts on those acres treated.

Direct effects from chemical control would result if individuals were directly exposed to the application. Some take of individuals could occur depending on the type of chemical and the amount of exposure an individual incurred. The potential effect should be limited to small mammals, amphibians, reptiles, and juveniles that are relatively immobile and unable to flee the treatment area. If timing of treatments were planned to avoid applications when young of the year are present, most effects may be mitigated.

Direct effects could also result from disturbance and displacement of individuals due to the human presence and associated activities with the treatment. These effects would be short-term in nature and should not pose a risk of take.

Indirect, long-term effects may result from a change in plant composition on the treatment area. Application of herbicides to control noxious weeds would generally remove other desirable broad leaf forbs and possibly shrubs. This change in species composition could render the area unsuitable or at least lower the productivity of the site for use by certain species. If control is limited to relatively small areas or spot treatment the effects should be insignificant due to the availability of adjacent habitats for animals to move to.

An indirect, long-term beneficial effect should result from the control of noxious or invasive species. Many noxious weeds can out-compete and displace native plant species thereby reducing productivity of a site or rendering the site unsuitable for many species. Control of noxious weeds could help maintain the native species plant composition over time thereby maintaining the suitability of the habitat for use by many more species than would be provided for if infested with noxious or invasive plant species.

Conclusion (Terrestrial Habitat and Species, including Special Status Species)

At first, comparing Alternative A to Alternative B involves comparing effects of wildland fire on wildlife to the effects of prescribed burning on wildlife. While some vertebrates are killed directly by fire, it is rare to kill vertebrates by prescribed burns. The other major effects of fire on wildlife, altering immediate postfire environments and influencing postfire habitat succession, would be determined as rehabilitation after wildland fire but could be considered as part of prescribed burning activity. Additionally, Alternative B would involve the selective introduction of fire to certain habitats and could be avoided in areas or at times where fire is not desired (e.g., in the immediate vicinity of sage grouse leks during nesting season). Eventually, application of prescribed fire on more acres (Alternative B) would reduce the likelihood of wildland fire and the associated impacts on wildlife and restore a more natural habitat to fire-adapted wildlife to a greater extent than with Alternative A.

Prescribed Fire: Prescribed fire would be applied when timing, season, and the severity of the fire can be controlled. Wildlife impacts would be mitigated by controlling fire effects on vegetation and habitat. Size, intensity, pattern, fuel, and soil moisture can be manipulated in the burn plans to have desirable effects on local wildlife. Prescribed fires would be less severe than wildfires, and the recovery of wildlife habitat and the associated vegetation would be quicker with prescribed fire.

Alternative B would favor wildlife species adapted to lower seral stages on an additional 106,000 acres of forestlands and shrublands treated with prescribed fire. Grasslands and agricultural lands would remain in the same seral or ecological succession stage.

Refer to Table 10 for a summary of wildlife habitat associations from a similar area. Wildlife that feed and reproduce on the ground and in grasslands would be favored on these treatment acres.

Mechanical Treatments:

An additional 123,000 acres would be mechanically treated in Alternative B. These treatments would benefit wildlife adapted to lower seral stages of vegetation referred to in prescribed fire. Wildlife species diversity may be reduced in the treatment areas, but the habitat edges created by the treatments would increase wildlife species diversity.

Chemical Weed Treatments:

In the fuel treatment areas, 185,000 acres of chemical treatments will be used to treat noxious weeds. This will reduce habitat for wildlife species dependent on some broadleaf forbs and affected shrubs in the short term (1-2 years). Examples of species associated with broadleaf forbs and shrubs would be sage grouse, ground squirrels, prairie dogs, sage grouse, mule deer, white-tailed deer, antelope, and several species of passerine birds.

Greater cumulative impacts on the wildlife community would occur from allowing noxious weeds to displace native habitat and create a monoculture of weeds, as compared to applying chemical treatments. A monoculture of weeds reduces habitat and species diversity.

All Treatments:

Site-specific environmental assessments for each vegetation treatment will ensure that local wildlife species concerns are addressed. All treatments would affect some change in the wildlife communities, which would be analyzed in the site-specific environmental analysis. The project would not be recommended if the impacts to the wildlife community are unacceptable or cannot be mitigated. Properly designed treatments can enhance wildlife and species diversity by creating edge effect. The amount of edge per unit area is directly related to habitat and species diversity. Any improvement of vegetative communities that increases structural (both horizontal and vertical) and species diversity would indirectly benefit wildlife.

Vegetation treatments can be considered tools for wildlife habitat management when vegetation responses and habitat requirements are understood. Accordingly, determinations on whether particular vegetation treatments will increase or decrease wildlife populations must be made on a site-specific basis, with consideration for local vegetation and wildlife information and responses to treatment.

The proposed action would result in fewer cumulative impacts to wildlife species and habitat compared to cumulative effects of the large, catastrophic wildfires that would be prevented. If fuels are left untreated, many of these wildfires would be stand replacement fires with a drastic change in ecological condition from late seral climax vegetation to an early seral stage.

Refer to Appendix B for possible wildlife design features based on the identifications of risk included in this analysis.

Conclusion - BLM Sensitive Species

Effects to sensitive species would result from either alternative. Although Alternative A would have fewer acres of fuels reduction treatments it could potentially result in greater number of acres burned by wildfire. Either of these activities could disturb and displace individuals, injure and/or kill individuals, and change habitat conditions that could make the site unsuitable for use by certain species. Changes in habitat conditions could also make a site more suitable for certain species thereby having beneficial effects.

It is impossible to quantify these effects without having site-specific project proposals. Even with specific project design, the effects of fire, either wildfire or prescribed fire, can be significantly different even on the same vegetative communities. Response of different vegetative communities (even in similar cover class (e.g., shrub, grass, forestland)) can have vastly different responses to similar treatments let alone different treatments or timing and intensity of treatments.

About 2.4 percent and 5.7 percent of the BLM administered lands would potentially be affected by Alternative A and Alternative B respectively. Chemical treatments for weeds may cause additional or cumulative effects but would be on the same acres as treated with prescribed fire and/or mechanical treatments. Considering that these treatments would be applied over a period of 10 years, the difference between the effects from Alternative A and B are negligible.

Impacts would occur from more acres of treatment on BLM administered lands under Alternative B (457,000 acres) compared to Alternative A (193,000 acres), and the overall effects of these impacts could result in disturbance, displacement, harm, or death of individual animals.

Fire (wildland fire and prescribed fire) would also change conditions of the habitat. Effects from wildfire should be considered in terms of cumulative effects and presumably would be greater in Alternative A.

It is assumed that fire risk would be reduced on treated acres. Given that the treatments would occur over a ten-year period, the difference between acres affected (protected from wildfire) is relatively negligible when considered in context

of the entire project area. Thus, although some beneficial effects would result from fuels treatments and reduced risk of wildfire, it is questionable that either alternative poses any greater or lesser cumulative effects than the other.

Of primary importance for conserving and recovering any sensitive species is to maintain suitable habitat in adequate patch size, spatially arranged across the landscape to allow for dispersal of young and availability of alternate home range should an individual be displaced from its current territory.

To ensure desired conditions are maintained to provide adequate amounts of suitable habitat, fuels treatment projects must be considered in context with recent wildfire events. Due to the uncertainty of wildfire, maximum limits of allowable habitat conversion (by habitat type) should be established within specific geographic areas to ensure habitat is maintained throughout the range over time.

Mitigation and protection measures will be used as design criteria in the specific project planning to minimize adverse impacts to the species. With application of these design criteria and attention paid to providing adequate amounts of suitable habitat spatially arranged across the landscape, no BLM sensitive species should be moved toward federal listing.

3.8 Federally Threatened, Endangered, and Proposed Species (BLM Critical Element)

Affected Environment (T/E/P Species):

There is potential for six endangered species, eight threatened species, and one species proposed for listing to occur within the project influence area in Montana and the Dakotas. There is also designated critical habitat for piping plover and proposed critical habitat for bull trout. Distribution by field office is summarized in Table 11.

Environmental Consequences (T/E/P Species)

Wildland Fire Management:

Management activities resulting from wildfire management would be similar for both alternatives. These activities would include all suppression actions and the associated activities and infrastructure necessary to support the suppression effort. Activities such as fire camps, helibases, helispots, opening of closed roads, creation of temporary roads, development or improvement of water sources (pump chance), staging areas, are some of the activities that may occur.

Prescribed Fire:

Comparison of Alternative A and B for effects to federally listed and proposed species from prescribed fire finds no significant difference for potential impacts to species that inhabit grasslands or shrublands. When compared with the

total acres of each cover type available on BLM administered lands, the differences between Alternatives A and B are negligible.

For treatment of forestlands, Alternative A would treat 99,000 acres (less than 13 percent) and Alternative B would treat 176,000 acres (less than 23 percent) of the total 760,000 acres of forestland administered by BLM Montana/Dakotas. Thus the effects of Alternative B (Preferred Alternative) would be nearly double that of Alternative A (No Action). Although Alternative B proposes to treat less than 23 percent of the forestland administered by BLM, treatment of 176,000 acres would pose risk of adverse effects to forest dwelling T&E species (Canada lynx, grizzly bear, grey wolf, bull trout, bald eagle).

Mechanical Treatments:

Mechanical treatments pose similar threats to federally listed species as prescribed burns except the risk of direct mortality is much lower. Mechanical treatments have the advantage of being a more "controlled" treatment and thereby being more capable of minimizing direct effects if a species or previously unknown key habitat is discovered. It is far more likely (as compared to prescribed burning) that mechanical activities could be modified to avoid a nest or den site or to move activities from an area where a T&E species is discovered.

Comparison of alternatives for effects to BLM sensitive species from mechanical treatments finds an increase in potential impacts from Alternative A to Alternative B. Alternative A would treat 35,000 acres total compared to the 158,000 acres under Alternative B. However, when compared to the total BLM administered acres, even the upper limit of treatments under Alternative B represents less than 2 percent of the total BLM acreage in Montana and the Dakotas.

This comparison carries through when the proposed treatments by the various cover types (grass, shrubs, forest) are compared for Alternative A and B. The potential effects for all three cover types are far greater under Alternative B due to the significant increase in acres proposed for treatment.

Although Alternative B represents substantial increases (6,000 percent in the grassland communities) in acres proposed for treatment as compared to Alternative A, when compared in context with the total acres under BLM administration of each cover type, even the upper level of treatment is somewhat insignificant. The higher level of treatment under Alternative B represents 0.3 percent of the grasslands, 1.5 percent of the shrublands and 10.1 percent of the forestland.

Chemical Weed Treatments:

Chemical treatments are planned in support of other fuels reduction treatments. The objective of chemical treatments

Table 11: Threatened and Endangered Species, by Field Office

| Species Listed by FWS on 8/24/02 in MT, ND, SD Common Name Scientific Name | Status | BLM Field Offices** with administrative jurisdiction in counties identified by FWS with species present ¹ | Field Offices** with habitat present ² | Field Offices** with documented occurrence within the project area of influence |
|--|------------|--|---|--|
| Eskimo Curlew <i>Numenius borealis</i> | Endangered | None | N/A | N/A |
| Interior Least Tern <i>Sterna antillarum</i> | Endangered | MT 020, 030, 040, 092 | MT 010, 020, 030, 040, 060, 064, 090, 092 | MT 020, 030, 040 |
| Whooping Crane <i>Grus americana</i> | Endangered | MT 010, 020, 030, 040, 050, 060, 064, 090, 092 | MT 010, 020, 050, 090, 092 | MT 020, 050 |
| Black-footed Ferret <i>Mustela nigripes</i> | Endangered | MT 010, 020, 030, 040, 060, 064, 070, 090, 092 | MT 010, 020, 030, 040, 060, 064, 070, 090, 092 | MT 040, 090 |
| Gray wolf <i>Canis lupus</i> | Endangered | MT 010, 050, 060, 064, 070, 100 | MT 010, 050, 060, 064, 070, 100 | MT 010, 050, 070, 100 |
| Pallid Sturgeon <i>Scaphirhynchus albus</i> | Endangered | MT 020, 030, 040, 060, 064, 090, 092 | MT 020, 030, 040, 060, 064, 090, 092 | MT 020, 030, 040, 060, 064, 090, 092 |
| Topeka Shiner <i>Notropis topeka</i> (South Dakota) | Endangered | MT 040 | None | N/A |
| White Sturgeon <i>Acipenser transmontanus</i> | Endangered | MT 100 | None | N/A |
| Scaleshell Mussel <i>Leptodea leptodon</i> | Endangered | None | N/A | N/A |
| American Burying Beetle <i>Nicrophorus americanus</i> | Endangered | MT 040 | MT 040 | None |
| Bald Eagle <i>Haliaeetus leucocephalus</i> | Threatened | All | All | All |
| Piping Plover <i>Charadrius melodus</i> | Threatened | MT 010, 020, 030, 040, 060, 064, 090, 092 | MT 010, 020, 030, 040, 090, 092 | MT 020, 092 |
| Canada Lynx <i>Lynx canadensis</i> | Threatened | MT 010, 050, 060, 070, 100 | MT 050, 060, 070, 100 | MT 050, 070, 100 |
| Grizzly Bear <i>Ursus arctos horribilis</i> | Threatened | MT 010, 050, 060, 070, 100 | MT 010, 050, 060, 070, 100 | MT 050, 060, 070, 100 |
| Bull Trout <i>Salvelinus confluentus</i> | Threatened | MT 100 | MT 100 | MT 100 |
| Spalding's Catchfly <i>Silene spaldingii</i> | Threatened | MT 100 | None | N/A |
| Ute Ladies'-tresses <i>Spiranthes diluviali</i> | Threatened | MT 050, 070, 100 | MT 050, 070, 100 | MT 050, 070 |
| Water Howellia <i>Howellia aquatilis</i> | Threatened | MT 100 | MT 100 | None |
| Western Prairie Fringed Orchid <i>Platanthera praeclara</i> (North Dakota) | Threatened | MT 030 | MT 030 | None |
| Mountain Plover <i>Charadrius montanus</i> | Proposed | All but MT 100 | All but MT 100 | MT 010, 020, 050, 060, 064, 070, 090, 092 |

¹ If BLM administered lands are not present in County identified by FWS no effects determination is needed

² If habitat is not present within the area of influence no effects determination is needed.

**Field Office Codes

| | | | | |
|-----------------|---------------------|--------------|-------------------|---------------------|
| MT 010—Billings | MT 050—Dillon | MT 090—Malta | MT 020—Miles City | MT 060—Lewistown |
| MT 092—Glasgow | MT 030—North Dakota | MT 064—Havre | MT 100—Missoula | MT 040—South Dakota |
| MT 070—Butte | | | | |

is to control noxious weed infestations that may exist prior to the primary fuels treatment or result post treatment. In some cases where there is a significant weed component in a proposed fuels treatment area, chemical control may be used both prior to and post fuels treatment projects. Most chemical treatments will be on relatively small isolated populations that would be spot treated using ground vehicles or manual application devices.

Large area chemical applications, with aircraft or vehicles, should be the exception and would only be used in areas of extreme weed infestations.

Chemical treatments would be used on 3,500 acres in Alternative A and 185,000 acres in alternative B. Although the specific locations of these treatments have not been identified, acres of chemical weed treatments would have nearly a complete overlap with other types of fuels reduction treatments. Thus, effects from chemical treatments would not contribute additional acres of disturbance but would contribute to the cumulative impacts on those acres treated.

Obviously, the level of disturbance will be considerably greater on an additional 181,500 acres of treatment under Alternative B. This disturbance would be in addition to other effects resulting from the fuels treatments.

Alternative A (No Action) may result in greater cumulative impacts on the wildlife community from allowing noxious weeds to spread and potentially displace native habitat and associated species, as compared to the application of chemical treatments under Alternative B.

Interior Least Tern (Endangered)

There is no known nesting or roosting occurring on BLM administered lands. However, one island in the Yellowstone River adjacent to BLM land (Miles City Field Office) contains a colony of nesting least terns. There is high likelihood that foraging occurs in sections of the Missouri and Yellowstone Rivers with BLM administered lands.

Due to the limited areas of use by interior least terns and the specific nesting habitat requirements, it is unlikely that any activities from wildland fire management or fuel reduction treatments would ever occur in close proximity of nesting birds. Given the characteristics of typical nest sites being dry, flat, sparsely vegetated sand and gravel bars within a wide, unobstructed, water-filled river channel there would be no fuels treatment planned for this habitat and therefore no direct effect from this activity.

There may be potential for indirect effects resulting from associated actions of fuels treatments in the uplands. Heavy equipment for mechanical treatments, equipment for prescribed burning, and/or chemical control all pose risk of hazardous fuel spills. Chemical treatments in the watershed also pose risk of down stream contamination. These hazards

could indirectly effect the preybase (fish) and/or nesting habitat. The likelihood of these effects is so small as to be discountable and would not adversely affect the species.

There is potential for insignificant direct and indirect impacts from wildland fire suppression activities. Wildland fires are not common along the major tributaries. When they occur they are usually small and quickly contained. If a fire occurs on a wooded island or wooded shoreline, human activities associated with suppression may cause short-term direct effects. Human traffic from fire crews, vehicle traffic, and possibly aircraft could disturb terns. It is discountable these actions would occur. If they did, they would be insignificant and would not adversely affect the species through abandonment of a nest site or other impact.

Suppression activities associated with fires near river corridors would usually use the corridor as a natural firebreak. Aerial suppression (fixed wing retardant drops or helicopter bucket drops) may be used to contain the fire near the river. Helicopter buckets may be filled in deep calm pools in the rivers. These pools usually are not close to suitable nesting sites and the prey base (fish). Effects of filling buckets, if any, would be short-term and discountable and would not adversely affect the species.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, the Proposed Action seems very insignificant. In relation to effects from large dams, irrigation ditch diversions, non-point source pollution, channelization, urban development, and instream alterations, the proposed action becomes moot. Although there is potential for insignificant minor effects these would not contribute, cumulatively, to cause adverse effects to the species.

Whooping Crane (Endangered)

Whooping cranes migrate over the analysis area and potential habitat exists but there has been no documented nesting, roosting, or foraging on BLM lands in the analysis area.

Since cranes prefer wetland sites with wide, open panoramas, they would be naturally insulated from the effects of wildland fire management activity and there would be no direct or indirect effects.

No fuels reduction treatments are planned for any riparian or wetland areas.

Cumulative Effects – There would be no direct, indirect, or cumulative effects.

Black-footed Ferret (Endangered)

Prairie dog towns are naturally insulated from wildfire effects due to the lack of vegetative cover resulting from prairie dog grazing. Wildfire would generally not burn a

prairie dog town but may burn areas around and between prairie dog towns. Fire suppression activities are not likely to effect prairie dog towns but could occur in nearby areas.

Direct effects to black-footed ferrets would be limited to disturbance from fire suppression activities and effects from smoke. These short-term effects would be insignificant, and not likely to adversely affect any black-footed ferrets.

Indirect effects may result from changes in vegetative cover and species types in areas disturbed by fire suppression activities. These effects would generally be limited to narrow corridors of fire line or travel ways on the fringes of prairie dog towns and in the surrounding areas. These effects could result in some reduced expansion rates of prairie dogs and/or reduced densities of prairie dog numbers on the edges of towns. This would be discountable and insignificant and would not likely adversely affect the black-footed ferret.

Due to the inherently low fuel levels on and around prairie dog towns there are no fuels treatments planned for these habitats and therefore no effects.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, the alternatives are insignificant. Although there is potential for insignificant minor effects, these would not contribute to cumulative adverse effects to the species.

Gray Wolf (Endangered)

Effects from wildland fire management activities would generally be limited to disturbance and displacement. Suppression activities, except aerial support, are usually restricted to the flanks of a fire. Fireline construction, and associated human presence and motorized equipment, should not cause direct effects to wolves. Wolves would usually flee in advance of an approaching fire and be out of the area of influence associated with suppression activities.

Aerial support could encounter wolves fleeing the area and cause some short-term direct effect from disturbance. There may also be short-term direct effects from disturbance caused by the increase in human activity, vehicle traffic, and associated infrastructure such as fire camps. These effects would be insignificant.

If fire suppression activities occur in suitable wolf habitat from April 15 to June 30, disturbance or displacement of a den or rendezvous site could result in adverse affects. Disturbance or displacement of a pack from a denning area or rendezvous site at this time could result in pups being separated from the pack thus leaving them susceptible to predation or, if orphaned for longer period of time, starvation.

Indirect, short or long-term effects resulting from fire suppression activities may result if new roads are created or previously closed roads are opened. Wolves may be

inhibited from returning to the area if vehicular traffic and human presence increases. This increased disturbance, resulting in the displacement of a wolf pack from an area, could potentially lead to adverse affects if the packs productivity is reduced. If a pack were displaced from an area that had provided suitable denning habitat for the pack to successfully reproduce and the pack subsequently relocated to an area that did not provide adequate habitat for successful reproduction, the resulting affect would be reduced productivity of the pack. Reduced productivity of a species resulting from the direct or indirect effects of an agency's action would constitute adverse affects to the species.

Fuels reduction treatments would target areas of overstocked stands of fire climax forest types, primarily ponderosa pine. Priority areas of treatment would be near communities but would not be limited to those areas. Generally, these are not areas frequented by wolves due to the presence of humans and/or marginal habitat.

Fuels treatments are proposed on over 280,000 acres of forested lands per decade. These treatments would include approximately 176,000 acres of prescribed fire and 107,000 acres of mechanical treatments. This represents 3 percent of the total BLM land acreage and up to 37 percent of the forested land type under BLM administration. If fuels reduction treatments are conducted in areas frequented by wolves it may cause both direct and indirect effects to the gray wolf.

If fuels treatments are conducted in the spring or early summer in areas inhabited by wolves there is potential for direct effects from disturbance and displacement of a pack and associated family unit. Juvenile, young of the year wolf pups could be fairly mobile at the time of project implementation; however, any project activities prior to June 30 pose the risk of adverse effects resulting from the displacement from a den site and the possible abandonment or segregation of a pup from the pack. If a pup were separated from the pack at this early age it would be very susceptible to predation or starvation.

To avoid possible adverse effects, fuels treatments shall be planned using the screening guidelines for gray wolf, as provided in the Northwest National Fire Plan Consultation Packet for Public Lands. These guidelines require that "no human disturbance or associated activities should be allowed within one mile of a den or rendezvous site from April 15 to June 30."

If fuels treatments are conducted in areas of existing or potential den sites, indirect effects could result from changed conditions that could render an area unsuitable for denning. Given the limited area of BLM jurisdiction that provides suitable wolf denning habitat, the lack of known den sites on BLM administered lands, and the relatively small acreage

of potential denning habitat that may be treated per decade, it is extremely unlikely and therefore discountable that fuels treatments would cause changed conditions of potential den sites such that it might impair the reproductive capability of a wolf pair and thereby adversely affect gray wolves.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action may cause adverse effects as a result of the incremental increase of effects. Due to the potential for direct and indirect effects from this action to result in the displacement of an individual or pack, and if other actions in the area (past, present or future) result in an animal being unable to find secure habitat and it results in an animal being harmed, injured, or killed as a result of this displacement, these effects would contribute, cumulatively, to cause adverse affects to the species.

Pallid Sturgeon (Endangered)

The primary factors associated with the decline of sturgeon are the past and present destruction and modification of habitat (USDI 1999b). The development of water resource projects within the Missouri River basin during the 1950's and 1960's, continued maintenance and operation of these projects, construction and operation of main stem and tributary dams and reservoirs, construction of river training structures, construction of levees for navigation and flood control, and water diversion projects have degraded sturgeon habitat.

The past and continuing destruction and alteration of the large river functions and habitat once provided by the Missouri and Mississippi Rivers is believed to be the primary cause of declines in reproduction, growth, and survival of large river fish such as the endangered pallid sturgeon.

The possibility of increased wildfire severity (under Alternative A) is not expected to adversely affect the endangered pallid sturgeon because it inhabits lower-elevation habitats in the Missouri River that are less responsive to federal land management and wildfire effects.

Some increased sedimentation could result from wildland fire management actions and fuel treatments in the uplands. Increased sedimentation could cause minor effects to water quality. These effects would be negligible, given the current non-point sources of pollution, existing levels of sedimentation, and natural erosion near large rivers.

Because of the great size of the rivers that pallid sturgeons inhabit and the typical water depths in which they have been found, the proposed activities would not contribute to direct, indirect, or cumulative effects and would not further compromise the status of the pallid sturgeon.

American Burying Beetle (Endangered)

This endangered species is very rare and listed only for the South Dakota portion of the project area. Within South Dakota it is only known to occur in Gregory and Tripp Counties of which BLM has 172 and 160 surface acres, respectively. There is no documented occurrence of the species on BLM lands.

There is a very low likelihood of the species occurring within the area of influence of the proposed action; however, if the American burying beetle did occur in the project area, activities associated with wildland fire management and/or fuels treatments may disturb and/or displace individual beetles. Since the American burying beetle is capable of flight it would generally flee in advance of activities associated with wildland fire management and/or fuels treatments; it is therefore so unlikely as to be discountable that any adverse effects would result.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action is insignificant. Although there is a remote chance for activities to displace beetles the effects would not contribute, cumulatively, to cause adverse affects to the species.

Bald Eagle (Threatened)

Specific direction is provided in the July 1994 Montana Bald Eagle Management Plan to eliminate potential threats to nesting bald eagles through the use of nest site management zones. These zones have various levels of restricted use. BLM has adopted these guidelines as standards in addition to recovery plans and conservation strategies. In general, fuels projects are not planned for areas inhabited by bald eagles. Adherence to these standards and guidelines in site specific project planning would ensure that no adverse effects result from fuels reduction projects.

Although it is unlikely that any activities from fuels treatments would affect eagles, there is potential for effects from wildland fire management activities.

Wildland fires are not common along major waterways and when they do occur they are generally small and quickly contained. Suppression activities along a wooded shoreline may cause direct effects resulting from disturbance due to human activities. Human traffic from fire crews, vehicle traffic, and possibly aircraft could disturb eagles. These actions could take place during the nesting period; if they did, the disturbance could potentially cause the abandonment of a nest site, thus resulting in adverse affects to the species.

It is possible that wildland fire suppression activities, primarily aerial support, could cause the loss of a nest structure. Any known nest sites would be protected from effects of suppression activities including aerial retardant or water drops from fixed wing or helicopter. However, with

the recent increased recruitment of new nest sites, a previously undiscovered nest could be impacted. If a low level flight, retardant drop, or helicopter bucket drop occurred near an occupied nest, birds could be hit, nests could be destroyed (blown from the tree), young eagles could be displaced from the nest at too early of an age, nest trees could be damaged (top breakage), or other impacts could result in long-term loss of pair productivity or direct take of a bird.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, cumulative effects from proposed actions would be no greater than the direct and indirect effects.

Piping Plover (Threatened)

There would be very little likelihood that wildland fire would occur in the types of areas that typically contain nest sites, (e.g., barren sand-pebble beaches, islands in freshwater and saline wetlands, and shorelines or exposed beds of larger reservoirs and rivers). If wildland fires occurred near occupied nesting habitat, it is not likely that suppression activities would disturb suitable nesting habitat, since the nesting habitat would act a natural firebreak.

There is potential for insignificant direct and indirect effects from wildland fire management activities. Should a fire occur on a wooded island or on a wooded shoreline, suppression activities may cause direct effects resulting from disturbance due to human activities. Disturbance resulting from fire crew activity, vehicle traffic, and possibly aircraft could present disturbance factors. It is discountable these actions would take place in close proximity to nesting piping plover and if they did the disturbance would be short-term, insignificant and would not adversely affect the species.

Although no fuels treatments are planned for piping plover habitat, there may be some potential for indirect effects resulting from associated actions of fuels treatments in the uplands. Heavy equipment for mechanical treatments, equipment for prescribed burning, and/or chemical control all pose some risk of hazardous fuel spills. In addition, any chemical treatments in the watershed pose some risk of down stream contamination. All of these hazards pose some threat of indirect effects to nesting habitat. The likelihood that any effect resulting from these risks is so small as to be discountable, and therefore are not likely to adversely affect the species.

When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action is insignificant. In relation to effects from large dams, irrigation ditch diversions, non-point source pollution, channelization, urban development, instream alterations, etc., the proposed action quickly becomes moot. Although there is some potential for insignificant minor effects these

would not contribute, cumulatively, to cause adverse affects to the species.

Piping Plover Designated Critical Habitat

BLM does not have surface management authority on any areas of Designated Critical Habitat for the Piping Plover. Proposed Critical Habitat is within the area of influence of the proposed action and there may be short-term effects from smoke, increased vehicle traffic on existing roads and trails, and possibly application of aerial retardant or water for fire suppression. These effects would be insignificant and not likely to adversely affect critical habitat.

Canada Lynx (Threatened)

Wildland fire management activities may disturb and displace Canada lynx. Suppression activities, except aerial support, usually flank fires. Fireline construction, and associated presence of humans and motorized equipment, should not cause direct effects to lynx. Lynx would usually flee in advance of an approaching fire and be out of the area of influence associated with suppression activities. An exception to this would be if an early season fire occurred in the vicinity of a den site. If kittens are not able to keep in contact with the mother, or if fire suppression activities encounter young that are temporarily left by the female while she is hunting, segregation or abandonment could result in direct adverse affects.

Aerial support, including fixed wing and helicopter, could encounter lynx fleeing the area and cause direct effect from disturbance. There may also be direct effects from disturbance caused by increased human activity, including vehicular traffic and associated infrastructure such as fire camps. These short-term effects would be insignificant.

Indirect, short or long-term effects from fire suppression activities may result from opening previously closed roads, constructing new or temporary roads, and building firebreaks and machine lines, etc. Effects would be most likely on ridges, saddles, or areas that would create permanent travel ways that could facilitate increased access by competitors (e.g., coyote, bobcat). Lynx may also be inhibited from returning to the area, after being displaced, due to reduced prey base or increased human presence as a result of increased vehicular traffic from increased open road densities. Increased access by competitors may cause indirect effects from competition for prey base.

Fuels treatments are proposed on over 280,000 acres of forestlands per decade. These treatments would include approximately 176,000 acres of prescribed fire and 107,000 acres of mechanical treatments. This represents 3 percent of the total BLM land and up to 37 percent of the forested land type under BLM administration. Fuels treatments conducted in areas frequented by lynx may cause both direct and indirect effects to the Canada lynx.

Fuels treatments would target areas of overstocked stands of fire climax forest types, primarily ponderosa pine. Priority areas of treatment would be near communities and developments but would not be limited to those areas. These are not areas frequented by lynx due to the presence of humans and unsuitable habitat. Any treatments prescribed in suitable lynx habitat shall follow the appropriate conservation measures provided in the Canada Lynx Conservation Strategy (LCS) and incorporated by this Proposed Action through land use plan amendments. Site-specific projects shall design fuel reduction treatments using the screening guidelines for Canada lynx, as provided in the Northwest National Fire Plan Consultation Packet for Public Lands and will also be subject to consultation requirements under Section 7 of the Endangered Species Act.

If fuels treatments are conducted in the spring or early summer in areas inhabited by lynx, there is potential for direct effects from disturbance and displacement of a family unit. Juvenile, young of the year lynx would generally not be very mobile at the time of project implementation. Any project activities prior to June 30 pose the risk of adverse effects resulting from the displacement from a den site and the possible abandonment or segregation of young from the female. If a kitten were separated from the female at this early age it would be very susceptible to predation or starvation. For that reason, seasonal restrictions would be imposed on fuels treatments in suitable lynx denning habitat to eliminate the potential for adverse effects.

If fuels treatments are conducted in areas of existing or potential den sites, there is potential for indirect effects resulting from changed conditions. By adhering to the conservation measures prescribed in the LCS, these effects would be insignificant, and suitable denning habitat would be retained in a spatial arrangement over time that would maintain the suitability of the area for denning.

Cumulative Effects – When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action may lead to adverse effects. Due to the potential for direct and indirect effects from this action to result in the displacement of a female with young, and if other actions in the area (past, present or future) result in the female and/or juveniles being unable to find secure habitat, and it results in an animal being harmed, injured, or killed as a result of this displacement, these effects would contribute, cumulatively, to cause adverse effects to the species.

By applying the conservation measures provided in the Lynx Conservation Strategy, habitat would be maintained or improved by any fuels treatment projects. Wildland fire management actions would also adhere to LCS guidelines.

If lynx denning habitat is limited in an area of BLM treatments, the treatment(s) must be consistent with the intent of the LCS and maintain suitable quantity and quality of foraging and denning habitat. If LCS standards are followed, no cumulative effects would result.

Grizzly Bear (Threatened)

There are no BLM administered lands within defined core areas. Effects to the grizzly bear would be limited to impacts outside the core areas. Use of BLM administered lands by grizzly bears outside the core areas is limited to transient bears moving between seasonal forage or moving between blocks of core areas.

Wildland fire management activities outside of core areas would be limited to insignificant short-term effects from disturbance and displacement. Suppression activities such as fireline construction with the associated presence of humans and motorized equipment should not cause any direct effects to grizzly bears. Bears would usually flee in advance of approaching fire and be out of the area of influence associated with suppression activities. If however, suppression activities were staged in advance of an approaching fire, grizzly may be encountered prior to their voluntary departure. Aerial support, including fixed wing and helicopter, could encounter grizzly either prior to their fleeing the area or while they are fleeing the area. Any interaction with the bear would cause some direct effect from disturbance.

There may also be some direct effects from disturbance caused by increased human activity in the area. These activities may increase vehicle traffic and the associated infrastructure such as fire camps. There is also a remote possibility of a direct encounter with a grizzly by an individual or group involved in fire management activities. Any direct encounter would most likely result in the bear being displaced from the area and could potentially result in adverse effects resulting from vehicular collision or human depredation.

Indirect, long-term effects from fire suppression activities may result from opening previously closed roads, constructing roads, firebreaks, machine lines, etc., and would contribute to the open and total route densities that are limited in these areas to protect grizzly bears. In accordance with Interagency Grizzly Bear Guidelines, BLM would make such routes inaccessible to motorized use or the routes would be included in access density calculations and thereby subject to appropriate access limitations.

Fuels treatments are proposed on over 280,000 acres of forestlands per decade. These treatments would include approximately 176,000 acres of prescribed fire and 107,000 acres of mechanical treatments. This represents 3 percent

of the total BLM land acreage and up to 37 percent of the forested land type under BLM administration. If fuel treatments are conducted in areas frequented by grizzly bears it may cause short and long-term, direct and indirect effects.

Fuel treatments would target areas of overstocked stands of fire climax forest types, primarily ponderosa pine. Priority areas of treatment would be near communities but would not be limited to those areas. These are not areas frequented by grizzly due to the presence of humans and other disturbance factors. Treatments prescribed in suitable grizzly habitat shall follow the appropriate measures for the specific ecosystem (Northern Continental Divide or Greater Yellowstone), as provided in the Interagency Grizzly Bear Guidelines and incorporated by this Proposed Action through land use plan amendments. Site-specific projects shall design fuel reduction treatments using the Interagency Grizzly Bear Guidelines as well as the grizzly bear screening guidelines provided in the Northwest National Fire Plan Consultation Packet for Public Lands and will be subject to consultation requirements under Section 7 of the Endangered Species Act.

Cumulative Effects—When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action may cause adverse affects as a result of the incremental increase of effects. Due to the potential for direct and indirect effects from this action to result in the displacement of an individual and, if other actions in the area (past present or future) result in an animal being unable to find secure habitat and it results in an animal being harmed, injured, or killed as a result of this displacement, these effects would contribute, cumulatively, to cause adverse affects to the species.

Bull Trout (Threatened)

Because sediment delivery and removal of riparian vegetation due to land management activities are commonly considered an impact to aquatic species, it is logical to conclude that preventing intense wildfire and the resulting decrease in post-fire erosion and sedimentation would be a benefit.

Suppression of wildfires can also, in certain situations, have adverse effects on aquatic populations. Fire lines, water drafting, and fuel spills can have significant short and long-term impacts on stream and wetland systems, especially the smaller streams where much of the activity often occurs takes place. Fire behavior is rarely predictable and commonly requires a host of suppression activities across many locations to cover contingencies should a fire change direction or character. One unfortunate (but often unavoidable) result is a network of firelines (hand or machine-built), in and outside the fire perimeter, which can have similar impacts as roads designed below-standards. Water drafting, fuel spills, and inputs of retardant also may

also adversely impact aquatic species, especially in smaller streams (Norris et al. 1991).

Attempts to reduce future fire risk may result in significant impacts to fisheries with no guarantee of positive return. Salvage of burned trees to reduce future fuel loading may be accomplished with minimal impacts in some areas, but in others, sensitivity to ground disturbance from loss of vegetation can cause increased erosion, compacted soils, and a loss of nutrients (USDA 2000, Beschta et al. 1995). Post-fire activities that increase the probability of chronic sediment inputs to aquatic systems may pose greater threats to bull trout and the aquatic ecosystem integrity than natural events associated with undesired forest stand condition (Frissell and Bayles 1996). Bull trout (Missoula Field Office only) occupy streams where protective habitat features and downstream refugia are still present. As a result, should severe wildfires occur, bull trout are expected to persist.

Although minimum-impact suppression techniques (MIST) have been developed, the primary objective during emergency suppression is to protect life and property. As described above, the impacts of suppression are typically greater to aquatic species than the impacts of the fire. Additionally, because species and habitat protection is (naturally) ranked below protection of life and property, there is no assurance that MIST techniques can and will be followed.

Specific impacts to aquatic species and habitats that have been documented during suppression operations in the past include: introduction of fire retardant in streams and wetlands, spillage of aviation fuel or lubricants in streams or introduction into water tables, construction of fire line (hand- and machine-built) and exposure of soils on steep slopes adjacent to streams, damage to riparian vegetation and soils from use of heavy equipment off of established roads, eliminating natural streamflow during drafting, establishment of fire camps in or adjacent to sensitive riparian areas.

Prescribed fire activities are often identical to those described in the suppression category. However, because prescribed fires are not an emergency, it is assumed that there will be sufficient planning to develop design features for the projects that will prevent adverse impacts to aquatic habitat and species.

Because the activities in prescribed fire may be similar to those in suppression, potential impacts may be the same. Additionally, improperly planned or “runaway” prescribed fire may severely burn riparian vegetation, reducing shade, exposing streamside soils, etc. Therefore, even though there are no fuels reduction treatments planned for riparian habitat types, there would still be some potential for adverse effects to bull trout from these activities.

All wildland fire management activities and fuel treatments will follow the conservation measures provided in the Interim Bull Trout Habitat Conservation Strategy. If these measures are followed, effects to bull trout from wildfire activities and fuels treatments would be minimized but may still lead to adverse effects.

Bull Trout Proposed Critical Habitat

With application of the Interim Bull Trout Habitat Conservation Strategy, effects from wildfire management activities and fuels treatments would be insignificant. Conservation measures that provide protective buffer area (Riparian Habitat Conservation Area) would ensure that no adverse modification to proposed critical habitat occurs.

Ute Ladies'-tresses and Water Howellia (Threatened)

Surveys for Ute ladies'-tresses were conducted to delimit the range of distribution in Montana, including the most likely BLM and NFS lands. This species was not found on NFS or BLM lands (B. Heidel, pers. comm. 2000).

BLM lands with potential habitat for the Water Howellia have been inventoried and no occurrence of the species has been documented. Due to low likelihood of occurrence for either species on BLM lands, the habitat for either species not being prone to wildland fire, and no fuels treatments planned for the habitat types that support either species, there would be no direct, indirect, or cumulative effects to either species.

If either species is located on BLM lands in the future, consultation for the action shall be reinitiated.

Western Prairie Fringed Orchid (Threatened)

This threatened species is restricted to areas in North Dakota. Due to the scattered nature and low number of BLM lands in North Dakota, the low likelihood of the species occurrence on BLM lands, and no fuels treatments planned for habitat types that support this species, there would be no direct, indirect, or cumulative effects.

Should populations of the species be located on BLM administered lands in the future, consultation for this action shall be reinitiated.

Mountain Plover (Proposed)

Due to the close association of the mountain plover with black-tailed prairie dog towns, the analysis for effects to this species are much the same as for black footed ferret.

Mountain plover would be most susceptible to effects caused by disturbance and displacement during the nesting and brooding season, which extends from mid-April through August. The preferred alternative may potentially cause direct effects to mountain plover during this time as a result of fire suppression or fuels reduction activities and effects from downwind smoke.

Areas suitable for mountain plover nesting such as prairie dog towns or habitat characterized by sparse vegetation with at least 30 percent bare ground are very unlikely to incur effects from wildfire. Prairie dog towns are naturally insulated from wildfire effects due to the lack of vegetative cover resulting from prairie dog grazing. Wildfire would generally not carry across a prairie dog town or other suitable nesting habitat but may burn areas around and between potential nesting areas. For this reason, it is discountable that fire suppression activities would be employed on prairie dog towns or come in contact with suitable nesting habitat, and therefore this action is not likely to adversely affect the mountain plover.

Indirect effects may occur as a result of changes in vegetative cover or species types in areas disturbed by fire suppression activities. These effects would generally be limited to narrow corridors of fire line or travel ways on the fringes of prairie dog towns and in the surrounding areas impacted by fire. These effects could result in some reduced expansion rates of prairie dogs and/or reduced densities of prairie dog numbers on the edges of towns. However, these corridors could also serve as dispersal corridors for prairie dogs to move off and colonize new areas, thereby creating additional habitat in the long term. Overall, it is discountable that these effects would occur and those that did would be insignificant in terms of acres of affected habitat, and therefore is not likely to adversely affect the mountain plover.

Due to the inherently low fuel levels on and around prairie dog towns and other suitable nesting habitat, there are no fuels treatments planned for these habitats types at this time and it is unlikely that these habitat types would ever be targeted for fuels treatments. Therefore, no effects, either direct or indirect, would occur as a result of fuels reduction activities.

When considered in context with past, present, and foreseeable future (non-federal) actions, the proposed action would not cumulatively contribute to cause an adverse effect or jeopardy to the species. Since any effects would be insignificant or discountable they would not cumulatively cause adverse effects or jeopardy.

Conclusion (T/E/P Species):

The Biological Assessment (BA) of Threatened, Endangered, and Proposed Species provides direction to protect these species and to mitigate potential adverse effects.

The mandatory direction contained in section 2.5.3.1 was designed to reduce potential adverse effects to federally listed and proposed species. These measures were included as mitigation in the Biological Assessment for this action and consulted on with the Fish and Wildlife Service under the requirements of Section 7 of the ESA. These measures would be followed during wildland fire management activities and fuels reduction projects, unless there is risk to

human life or a more preferable way of minimizing the effects, based on characteristics of individual projects, could be developed through consultation with the Fish and Wildlife Service.

Wildland fire management and fuels reduction activities would also operate under applicable guidelines, standards and protection measures as established in this document and incorporated into the land use plans through amendment.

Based on the mitigation and protection afforded by the guidance and direction contained in this assessment, the following determinations of effect to federally listed threatened, endangered, and proposed species, and proposed critical habitat are made for the area of influence of the proposed action.

No Effect

- Whooping Crane
- Pallid Sturgeon
- Ute Ladies'-tresses
- Water Howellia
- Western Prairie Fringed Orchid
- Critical Habitat for Piping Plover

May Affect but Is Not Likely to Adversely Affect

- Interior Least Tern
- Black-footed Ferret
- American Burying Beetle
- Piping Plover
- Mountain Plover

May Affect and Is Likely to Adversely Affect

- Gray Wolf
- Bald Eagle
- Canada Lynx
- Grizzly Bear
- Bull Trout
- Proposed Critical Habitat for Bull Trout

Not Likely to Jeopardize the Species

- Mountain Plover – (under the current proposed status); and

May Affect but Is Not Likely to Adversely Affect (under the Threatened status if the Mountain Plover is listed).

3.9 Cultural (BLM Critical Element) and Paleontological Resources

The BLM will comply with requirements in the National Historic Preservation Act (NHPA) and will ensure the identification of cultural resources that may be affected by a federal undertaking (e.g., fire restoration activities). Cultural resources considered eligible for or listed on the National Register of Historic Places should either be avoided or a plan for mitigating the effects of the proposed action

should be formulated and implemented. BLM will consider effects to eligible cultural resources according to existing agreements developed for purposes of fulfilling responsibilities under the NHPA. If no agreements are in place, eligible cultural resources will be considered consistent with regulations at 36 CFR 800.

Environmental Consequences

The effect of wildland fire and prescribed burning on cultural resources depends on the location of the resource with respect to the ground surface, the proximity to fuels that could provide a source of heat, the material from which artifacts are made, and the temperature to which artifacts are exposed. Threshold temperatures for damage to cultural artifacts manufactured from different materials, such as ceramic or stone, vary significantly.

Surface or near-surface cultural materials may be damaged, destroyed, or remain essentially unaffected by fires, depending on the temperatures reached and the duration of exposure to that temperature. Wooden structures or wooden parts of stone structures are susceptible to fire. Combustible artifacts lying directly on the ground surface could be damaged or destroyed. The ability to date noncombustible surface artifacts may be adversely affected if exposed to specific high temperatures. Subsurface materials are usually affected by fire only if excessive amounts of soil heating occur (where dry accumulations of dead woody fuel or duff layers are consumed, as by wildland fire).

Prescribed fires in areas of cultural significance would not be ignited under conditions dry enough to cause significant subsurface heating. Subsurface cultural resources are generally more subject to harm from construction of fire lines around planned fire boundaries than from the fire itself.

The heat, smoke, and soot from fires can also damage cultural resources, especially prehistoric rock art, by causing spalling which physically destroys the resource or by obscuring the surface of the resource with smoke and soot. Smoke and soot can damage cultural resources by either increasing chemical deterioration or obscuring carvings and painted motifs.

Damage to cultural resources, prehistoric and historic, also results from fire suppression related activities. Cultural resources may be more at risk from activities such as blading fire lines, setting camps and staging areas, or using vehicles off road, than by the fire.

Impacts from smoke, heat, or soot are not believed to produce measurable effects on fossil resources unless those elements are in close proximity the resources.

The effect of fire on fossil resources is directly related to the location of the resource with respect to the ground

surface, the proximity of the fuels which provide the source of heat, and the location and use of hand tools, motorized vehicles, fossil collecting activities, and heavy equipment. Fossils lying at or near the surface would likely be located in an area lacking vegetation or fuel.

Wildland fire and prescribed burns make sites more susceptible to the effects of erosion and it also results in a more visible resource. Illegal collecting may increase on burned areas, especially along access routes.

The greatest risk for these resources would likely come from the equipment and activities associated with fire management activities. This includes any surface disturbing activities such as camp preparation, fire line construction, motorized vehicle use, and heavy equipment operation. If these activities are isolated from the fossil producing formations, the impacts to these resources should be negligible.

For fuel reduction projects where mechanical treatments are proposed, a Class III inventory would be conducted. If prehistoric or historic resources are located, the mechanical treatment would be changed to avoid or provide treatment to the resource to eliminate harm to heritage resources. Given these procedures, impacts to significant cultural resources are not anticipated from mechanical treatments.

In areas where fossil resources are known or anticipated, mechanical treatments will include provisions to avoid areas containing sensitive fossil producing formations. If those areas cannot be avoided by the treatments or associated activities, a qualified paleontologist will be retained to recover specimens subject to direct impact.

Conclusion:

With Alternative A, wildland fires would be anticipated on over 47,000 acres over the next decade. Any or all of the impacts associated with wildland fire and fire suppression described above could also be anticipated.

Cultural resources that are listed or eligible for listing on the National Register of Historic Places (NRHP) would either be avoided, or a plan for mitigating the effects of the fuel treatments would be formulated and implemented. This would minimize the effects on cultural resources of treating an estimated 193,000 acres within a decade.

Alternative B would provide additional fire management guidance for wildland fire suppression and, in addition,

continue with current survey guidelines for prescribed burns in Montana and sets guidelines for prescribed burns in North and South Dakota. The continuation of existing policy on prescribed burns for Montana, the implementation of new prescribed burn guidelines for North and South Dakota, and changes in the way cultural resources are considered in a wildland fire suppression environment are all aimed at the protection of cultural resources.

Little or no impact would be anticipated from fuels management activities on 457,000 acres per decade since sites would be examined for cultural and paleontological resources before any activity would occur. Impacts would be avoided or mitigated.

Under Alternative A, management of paleontological resources for prescribed burns or for wildfire management is generally absent. Alternative B does provide fire management objectives and guidance for wildland fire suppression and rehabilitation and also provides guidance for prescribed fire. These guidelines are intended to provide added protection to paleontological resources during wildfire suppression and prescribed fire activities.

3.10 Areas of Critical Environmental Concern (BLM Critical Element)

Over 40 areas within Montana and the Dakotas have been found suitable for designation as Areas of Critical Environmental Concern (ACECs). These areas have received special designations and ACEC management plans have been adopted to protect unique resources and values. Fire management zone categorizations for each ACEC are listed in Table 12. Neither alternative would result in negative effects to ACECs because ACEC status would be considered for both fire management actions and in site-specific implementation assessments for hazardous fuels reduction projects.

3.11 Prime or Unique Farm Lands (BLM Critical Element)

The Farmland Protection Policy Act of 1985 and 1995 requires that actions be identified if they would affect any lands classified as prime and unique farmlands. Neither the wildland fire suppression nor the fuels treatments anticipated with either alternative would contribute to the unnecessary and irreversible conversion of prime or unique farmland to non-agricultural uses.

Table 12 Areas of Critical Environmental Concern

| ACEC Name | Acres | Reason for Designation | Category and Fire Management Zone (Alternative B) |
|----------------------------------|--------|--|---|
| Billings Field Office | | | |
| Four Dances | 765 | Archaeology, cultural values, scenery, natural hazards, historic | B Billings Grasslands |
| East Pryor Mountains | 29,500 | Wildlife, wild horses, paleontology | C Pryor Mountains |
| Weatherman Draw | 4,268 | Cultural | B Billings Grasslands |
| Meeteetse Spires | 960 | Rare plant, hazardous cliffs, scenery | B Billings Grasslands |
| Bridger Fossil | 575 | Paleontology | B Billings Grasslands |
| Stark Site | 800 | Cultural | B Billings Grasslands |
| Petroglyph Canyon | 240 | Cultural | B Billings Grasslands |
| Pompey's Pillar | 470 | Historic, cultural, recreation | B Pompeys Pillar |
| Castle Butte | 185 | Cultural | B Billings Grasslands |
| Butte Field Office | | | |
| Sleeping Giant | 11,609 | Recreation, scenic, fish and wildlife | C Sleeping Giant/Sheep Creek |
| Lewistown Field Office | | | |
| Sweetgrass Hills | 7,952 | Cultural, T&E, wildlife, recreation | B Grass/Rangelands |
| Kevin Rim | 4,657 | Wildlife (raptors), cultural, recreation | B Grass/Rangelands |
| Acid Shale-Pine Forest | 2,463 | Endemic plant community | B Grass/Rangelands |
| Judith Mountains Scenic Area | 3,702 | Scenic, wildlife, recreation | B Timber/Mountain Ranges |
| Collar Gulch | 1,618 | Westslope cutthroat trout | B Timber/Mountain Ranges |
| Square Butte ONA | 1,947 | Natural endemic systems, cultural, scenic, geologic | B Grass/Rangelands |
| Cow Creek | 14,000 | Riparian, natural hazard, geology, scenic, natural system, Nez Perce trail | C Missouri Breaks |
| Malta Field Office | | | |
| Prairie Dog Towns | 12,346 | Black-footed ferret reintroduction habitat | B Grass/Range Lands |
| Big Bend of the Milk River | 2,120 | Archaeological resources | B Grass/Range Lands |
| Azure Cave | 140 | Cave resources, bats | B Timber/Mountain Range |
| Miles City Field Office | | | |
| Powder River Depot | 1,386 | Cultural | C Special Management Areas |
| Hell Creek | 19,169 | Paleontology | C Special Management Areas |
| Sand Arroyo | 9,056 | Paleontology | C Special Management Areas |
| Smoky Butte | 80 | Geology, recreation | C Special Management Areas |
| Black-Footed Ferret | 11,166 | Wildlife | C Special Management Areas |
| Piping Plover | 16 | Wildlife | C Special Management Areas |
| Jordan Bison Kill | 160 | Cultural | C Special Management Areas |
| Seline | 80 | Cultural | C Special Management Areas |
| Ash Creek Divide | 7,931 | Paleontology | C Special Management Areas |
| Hoe | 144 | Cultural | C Special Management Areas |
| Big Sheep Mountain | 360 | Cultural | C Special Management Areas |
| Bug Creek | 3,840 | Paleontology | C Special Management Areas |
| Finger Buttes | 1,520 | Scenery | C Special Management Areas |
| Howrey Island | 321 | T&E Wildlife | C Special Management Areas |
| Battle Butte | 120 | Cultural | C Special Management Areas |
| Reynolds Battlefield | 336 | Cultural | C Special Management Areas |
| Missoula Field Office | | | |
| Bear Creek Flats | 564 | Riparian, fish, old growth pine, | C Blackfoot |
| Rattler Gulch Limestone Cliffs | 20 | Geological | B Clark Fork Front |
| Squaw Rock | 640 | Scenic, wildlife, recreation, T&E fish (bull trout) | B Flintrock |
| South Dakota Field Office | | | |
| Fort Meade Recreation Area | 6,700 | Historic, cultural | B Ft. Meade Rec. Area ACEC |
| Fossil Cycad | 321 | Paleontology | B Remainder of SD Field Office |

3.12 Floodplains (BLM Critical Element)

Executive Order 11988 was enacted to “avoid to the extent possible the long-term and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.” No developments or effects of development by the BLM would be anticipated in a floodplain with either alternative.

3.13 Invasive and Non-Native Species (BLM Critical Element)

Some of the activities and land uses would introduce and/or spread noxious weeds. Chemical treatments considered in this analysis are mostly related to weed treatments. Anticipated levels of treatments for each alternative are displayed in Tables 2 and 5. A brief description of these treatments is available in section 3.1.1.3.

3.14 Native American Religious Concerns (BLM Critical Element)

Contact was initiated with Native American groups. No concerns were submitted that either alternative would interfere with the inherent right of freedom to believe, express, and exercise traditional religions, including access to religious sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites as established in the American Indian Religious Freedom Act of 1978.

3.15 Wastes, Hazardous or Solid (BLM Critical Element)

Activities associated with either alternative would be conducted to be in compliance with the Resource Conservation and Recovery Act (RCRA), that provides “cradle to grave” control of hazardous waste and solid wastes by imposing management requirements on generators and transporters of the wastes. Spills of retardant, fuels, and other chemicals may be subject to the spill reporting requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or Clean Water Act. These reporting requirements are contained in the National Contingency Plan (40 CFR Part 300). In general, with “proper housekeeping procedures,” compliance with these environmental laws and regulations would not be a significant concern for any of the activities associated with the two alternatives.

3.16 Wetlands/Riparian Zones (BLM Critical Element)

Management considerations must comply with Executive Order 11990, Protection of Wetlands, which requires federal agencies to minimize the destruction, loss, or degradation of wetlands while preserving and enhancing their natural and beneficial values on federal property. The order restricts most activities that could affect wetlands administered by the federal government. Activities mentioned in the EO include federal activities and programs affecting land use.

See Aquatic Habitats in Section 3.6 for impact analysis.

3.17 Wild and Scenic Rivers (BLM Critical Element)

BLM currently manages one designated Wild and Scenic River segment. The Upper Missouri National Wild and Scenic River (UMNWSR) is located between Fort Benton and US Highway 191 in northcentral Montana. This 149-mile stretch of river flows generally west to east through Chouteau, Blaine, Fergus, and Phillips counties. Neither public input nor analysis identified issues/concerns on the relationship of fire and fuels management to the Upper Missouri Wild and Scenic River designation.

3.18 Recreational and Visual Resources

Environmental Consequences (Recreation and Visual)

Large severe wildland fires change the landscape in a way that degrades visual quality and recreation opportunities and recreation experiences, especially on fragile soils and forestlands where the duration of impacts is also longer. The use of heavy equipment to blade fire lines and the use of staging areas leaves lasting visual scars that degrade the visual quality and recreation experience. The landscape may be blackened until vegetation is reestablished.

Full suppression could change the landscape to clearly appear altered by man. For example, a bladed fire line may create a visual contrast that makes human intervention apparent.

Potential visual effects from a severe wildland fire may include loss of living timber, blackening the landscape, and blackened deadfall.

Smoke from fires degrades air quality, visual quality, and recreational experiences. Visitation to burned areas would decline or cease altogether until recovery. Visitation could increase fairly soon if the fire creates more “edge effect”, i.e. the richness of flora and fauna occurring in a transition

zone where two plant communities or successional stages meet and mix (USDA 1988).

During periods of high fire danger and extensive wildland fire activity, such as in the summer of 2000, recreation use may be restricted or prohibited on large areas of public lands to protect public safety

Prescribed burning creates contrasting blackened areas and releases smoke into the air that temporarily impairs visibility. Burning does lessen the amount of logging debris that is seen and darkens the color of stumps and snags that, if not burned, would become more noticeable as they bleached over time.

The recreation and visual impacts described above would be more common with Alternative A because wildland fires would be expected to burn hotter and be more severe than with Alternative B. Alternative A also provides less guidance to protect visual and recreation resources.

Short-term adverse visual impacts would be associated with mechanical and chemical treatments. For example, thinning hazardous forest fuels would change the visual character of the forest viewshed. Slash piles would create short-term visual impacts until piles are burned and the burned spots are seeded. These treatments would reduce the potential for negative long-term visual impacts associated with a stand-replacement fire. Measures such as feathered fuel breaks and treating areas in a mosaic pattern would help reduce visual impact of reducing hazardous fuels by thinning forestlands or using prescribed burns. These impacts would be more likely with Alternative B since more areas would be treated.

Conclusion (Recreation and Visual)

With Alternative A, more severe wild fires would be expected especially near priority interface areas where visual quality is often a public concern of rural residents. Most of the wildfires on untreated forestlands would be stand replacement fires that change the visual quality and visual resource management (VRM) class for many years and the recreation experience for almost as long.

Prescribed fire and mechanical treatments on 50,000 acres of grasslands, 9,000 acres of shrublands, and 130,000 acres of forestlands over a 10-year period would also affect visual quality and recreation experiences.

Treatments anticipated with both alternatives would help reduce the risks of wildland fire impacts

With Alternative B, wildland fires would be expected to burn fewer acres and cause less severe visual impacts. The long-term potential for stand-replacement wildland fires would decrease, with a corresponding decrease in visual and recreation impacts.

Visual quality and recreation opportunities would be affected by prescribed fire and mechanical treatments applied to more areas (90,000 acres of grasslands, 77,000 acres of shrublands, and 283,000 acres of forestlands). New guidance for fuel treatments (see section 2.5.3.1) would help mitigate adverse impacts.

3.19 Wilderness (BLM Critical Element) and Wilderness Study Areas

Affected Environment (Wilderness and Special Areas)

One 6,000-acre BLM site in Montana/Dakotas is a designated Wilderness Area, and 40 BLM sites totaling 452,563 acres are Wilderness Study Areas (WSAs). The WSAs meet the criteria set forth for potential wilderness designation under the Wilderness Act of 1964. These criteria include size, influence of man, absence of human habitation, and opportunities for solitude of primitive and unconfined type of recreation. All Wilderness and WSAs are classified as VRM Class I unless specifically exempted from this classification in an RMP.

Fire is a natural component of many wilderness ecosystems and WSAs. Lightning caused fires should be allowed to play, as nearly as possible, their natural ecological role within wilderness and wilderness study areas.

Special consideration and restrictions must be applied in wildland fire suppression and hazardous fuel reduction efforts in wilderness and wilderness study areas. Actions in WSAs are guided by the Interim Management Policy (IMP) until Congress makes a final wilderness determination. The Interim Management Policy and BLM Handbook H-8560-1 provide for the management of designated Wilderness Areas, including objectives for fire management.

In conjunction with allowing naturally occurring fires to play their natural ecological role, fire plans for WSAs need to be developed. Fire suppression in designated wilderness and WSAs would use methods that are least damaging to wilderness values, including Light-on-the-land and MIST, and consider minimum tool requirements. Prescribed burning and other fuels management are not exceptions to the Nonimpairment Mandate. Any such activities proposed must not impair wilderness values and must be analyzed with pre-IMP screens, IMP screens, public notification and the Nonimpairment environmental analysis. Management-ignited fires should not be used to achieve wilderness objectives where lightning caused fires can achieve them.

Environmental Consequences (Wilderness and Special Areas)

There would be very little difference in impacts on wilderness and wilderness values anticipated between the

Table 13 BLM Wilderness and Wilderness Study Areas

| Name(Acres) | WSA Catalog Number | Category and FMZ |
|---|---|---|
| Burnt Timber Canyon (3,430) Pryor Mountain (13,397; 4,352 additional in WY) Big Horn Tack On (3,308; 353 additional in WY) Twin Coulee (6,870) | <i>Billings Field Office</i> MT-067-205 MT-067-206 MT-067-207 MT-067-212 | C Pryor Mountain C Pryor Mountain C Pryor Mountain B Twin Coulee WSA |
| Humburg Spires (11,175) Sleeping Giant/Sheep Creek Black Sage (5,926) Yellowstone River Island (53) Elk Horn MT Section 202 (3,585) | <i>Butte Field Office</i> MT-ISA-003 MT-075-111 MT-075-115 MT-074-133 MT-075-114 | C McCartney-Rochester C Sleeping Giant-Sheep Creek C Three Forks A Bozeman-Livingston Scattered Tracts C Elkhorn Mountains |
| Bear Trap Canyon WILDERNESS (6,000) Ruby Mountains (26,611) Blacktail Mountains (17,497) East Fork, Blacktail Deer Creek (6,230) Hidden Pasture Creek (15,509) Bell/Limekiln Canyons (9,650) Henneberry Ridge (9,806) Farlin Creek (1,139) Section 202 Axolotl Lakes (7,804) Centennial Mountains (27,691) Tobacco Root Tack On | <i>Dillon Field Office</i> MT-076-001 MT-076-002 MT-076-007 MT-076-022 MT-076-026 MT-076-028 MT-076-034 MT-076-069 MT-076-069 MT-ISA-002 Section 202** | C East Madison D North Rubys C Blacktail Mountains C Sweetwater-Ruby C Tendoy Mountains C Tendoy Mountains C Tendoy Mountains C Southeast Foothills-Pioneers C Gravelly Mountains C Centennial C Tobacco Root Mountains |
| Square Butte (1,947) Stafford (4,800) Ervin Ridge (10,200) *Cow Creek (34,050) Dog Creek South (5,150) Woodhawk (8,100) Beaver Meadows (595) North Fork Sun River (196) | <i>Lewistown Field Office</i> MT-ISA-004 MT-068-250 MT-068-253 MT-066-256 MT-068-244 MT-068-246 Section 202** Section 202** | B Range/Grasslands C Missouri Breaks C Missouri Breaks C Missouri Breaks C Missouri Breaks C Missouri Breaks C Missouri Breaks B Range/Grasslands C Rocky Mountain Front |
| Burnt Lodge (13,730) Bitter Creek (59,600) Antelope Creek (12,350) | <i>Malta Field Office</i> MT-065-278 MT-064-356 MT-065-266 | B Range/Grasslands B Range/Grasslands C Missouri Breaks |
| Billy Creek (3,450) Seven Blackfoot (20,330) Bridge Coulee (5,900) Musselshell Breaks (8,650) Terry Badlands (44,910) Zook Creek (8,438) Buffalo Creek (5,650) | <i>Miles City Field Office</i> MT-024-633 MT-024-657 MT-024-657 MT-024-677 MT-024-684 MT-027-701 MT-027-702 | C Special Management Areas C Special Management Areas C Special Management Areas C Special Management Areas C Special Management Areas C Special Management Areas C Special Management Areas |
| Wales Creek (11,580) Hoodoo Mountain (11,380) Quigg West (520) | <i>Missoula Field Office</i> MT-074-151A MT-074-155 MT-074-150 | C Hoodoo B Flintrock C Blackfoot |

*Management responsibility is shared with Malta Field Office

**Section 202: Study not complete

two alternatives at this level of planning. The guidelines, regulations, and policies are established and must be followed. Analysis of the impacts would be determined in any project-level analysis. However, with Alternative B, there may be more of an awareness of the special considerations required for fire management of wilderness and WSAs and also a heightened awareness of their locations and boundaries.

3.20 Environmental Justice (BLM Critical Element)

Neither alternative would result in identifiable effects or issues specific to any minority or low-income population or community. BLM has considered all input from persons or groups regardless of age, race, income status, or other social or economic characteristic.

3.21 Social, Human Health, and Safety

Affected Environment (Social, human health and safety)

In 2002, the populations of Montana, North Dakota and South Dakota were each less than one million people, resulting in population densities of 6 people per square mile in Montana, 9 people per square mile in North Dakota and 10 people per square mile in South Dakota. Montana's 2000 population of 902,165 was a 13 percent increase over 1990. During the same time period South Dakota's population (754,844 in 2000) grew by nine percent and North Dakota's population (642,200 in 2000) grew by less than one percent. The populations of all three states are expected to grow in the next 25 years.

Populations projections for Montana in 2025 range between 1,121,000 and 1,187,000. Populations projections for North Dakota in 2025 range between 729,000 and 778,000. The same figures for South Dakota are between 866,000 and 962,000 in 2025.

The movement of people into some rural areas began in the 1970s and is expected to continue into the 21st century. In scenic areas, particularly those suited for recreation, lands are being developed for recreation uses or subdivided for homes and cabins. New rural subdivisions are appearing across Montana and the Dakotas.

In some cases, these subdivisions are adjacent to public lands. In 1999, BLM field office personnel completed a Wildland/Urban Interface Risk Questionnaire for areas adjacent to public lands. Of 79 priority communities identified as part of the 1999 survey, 67 had moderate to high escaped fire potential and/or moderate to high potential for loss of life or property; 11 were considered to have high

level of community support for actions to reduce hazardous fuels; 16 were considered neutral or not to have an opinion; and seven were considered to be averse to hazardous fuels projects. The level of community support was unknown for the other communities. Since that survey was completed, wildland fire has occurred in or near six of the priority communities.

The extreme fire season of 2000 brought a surge of interest in attitudes toward wildfires and vegetative treatments that could address fire potential. A national level survey conducted in the summer of 2001 asked questions about attitudes toward vegetative treatment on public forests and rangelands (Schindler and Brunson, 2002). About 40 percent of the respondents supported the use of prescribed fires "whenever managers see fit," while an equal number of respondents indicated prescribed fires should be done "only infrequently, in carefully selected areas." Nearly half of the respondents indicated that mechanical vegetation removal on public lands is a legitimate tool that resource managers should be able to use whenever they see fit, with another quarter of the respondents indicating that it is something that should be done only infrequently in carefully selected areas. Concerns about prescribed fire include loss of wildlife and fish habitat (64 percent of respondents indicated that this was of great to moderate concern), damage to private property (59 percent), deteriorated public water supply (56 percent), increased levels of smoke (53 percent), economic loss of usable timber (44 percent), reduced scenic quality (42 percent), and effects on recreation opportunities (41 percent).

A survey of attitudes toward forest and fire management in the urban-wildland interface was conducted in Ravalli County after the severe fire season of 2000 (University of Montana (UM), Bureau of Business and Economic Research (BBER), 2001). Respondents indicated that the following were important or very important:

- Educating landowners about fire hazards (88 percent of respondents),
- Reducing fuels and fire hazards (84 percent of respondents),
- Thinning trees (83 percent of respondents),
- Using prescribed burning (66 percent of respondents), and
- Doing nothing in the urban-wildland interface (5 percent of respondents)

Protection of human life is the top priority established by the 2001 Review and Update of the Federal Wildland Fire Management Policy. During wildland fire management (suppression) activities, human safety will be considered above other values and response will be designed accordingly.

Environmental Consequences (Social, human health and safety)

Under Alternative A, in an average 10 year period, 158,000 acres would be treated with prescribed burns, 35,000 acres would be mechanically treated, and 3,500 acres of weed would be chemically treated. The existing fire trends concerning fire size, intensity, and severity would continue on untreated areas.

Smoke can have a short-term impact on air quality. Individuals may experience eye, throat, or lung irritation from these exposures. People with asthma, allergies, and other breathing difficulties are likely to be especially sensitive to smoke from both wildland fires and from prescribed fires.

Other potential effects of wildland fires include potential injury, loss of property, and reduced recreation potential (UM BBER, 2001).

Alternative A would be less responsive to the preference for active fire management as reported in the study by UM BBER. There would be more disruption of daily living patterns if wildfires were to occur and health and safety concerns could not be addressed. Visual impacts would not be mitigated under this alternative.

With Alternative A, fuels treatments and protection of communities near the Missouri River Breaks, Ingomar Village, and Masurva may be more costly, less effective, and implemented later because the Big Dry RMP limits the use of timber sale contracts as a tool to reduce hazardous fuels. Fuels treatment and protection of communities of Pine Hills, Moon Creek, Ekalaka Hills, Camp Needmore, Molstad Ranch, and West Pines would likely be more costly, less effective, and implemented later because the anticipated use of prescribed fire to reduce hazardous fuels in the Powder River RMP areas would proceed at 20 acres per year, based on existing analysis.

Under Alternative B, in an average 10-year period, 299,000 acres would be treated with prescribed burns, 158,000 acres would be mechanically treated, and 185,000 acres of weed would be chemically treated. The severity of wildfires should be lower, especially near communities at risk, resulting in lesser effects than under Alternative A. In addition, public lands near communities with high or moderate escaped fire potential/high or moderate potential for loss of life or property would likely be treated within 10 years.

Alternative B is more responsive to the preference voiced for active fire management. There would be disruption of daily living patterns for activities such as prescribed burns, mechanical and chemical treatments, but these activities would be scheduled to take health and safety concerns into

consideration and would be conducted in a manner to avoid or minimize impacts to local residents.

Permitted public land users would be consulted when planning treatments. Some uses, e.g., livestock grazing, may have to be altered immediately after prescribed burns. However, affected users would generally be willing to accept temporary restrictions because the alternative could be greater risk of uncontrolled wildfire. The potential visual impacts of fuel treatments would be less than under Alternative A because timing and planning of treatments would be managed and effects would be mitigated. Local communities would benefit when local hires and use of local businesses occur.

With Alternative B, fuels treatments and protection of communities in the Big Dry and Powder River RMP areas would not be subject to the limitations noted for Alternative A. Human health and safety near the communities at risk would receive more protection.

Conclusion

Alternative B is more responsive to the preference voiced for active fire management and human health and safety would receive more protection in the communities at risk in the Big Dry and Powder River RMP areas. The effects would be preferable to those from Alternative A because activities would be mitigated to minimize health and safety concerns, visual impacts, etc. Local communities would benefit because local hires and use of local businesses would be emphasized.

3.22 Economics

A restoration/fuel-reduction program in Montana would reduce fire hazard, improve ecological conditions of forests, and result in economic benefits that exceed hazard reduction costs (Keegan, C.E, C. E. Fiedler, and T.A. Morgan, 2002). Keegan et al. 2001) concluded that the economic benefits of reducing wildland fire hazard and improving ecological condition would be protection of recreation opportunities and property values, reduced firefighting costs, and a sustainable supply of timber which could increase employment opportunities and revenues.

If fuel treatments result in the use of sawlog/veneer log-sized material, production would increase in the forest products industry that has 145 MMBF of unutilized capacity (Keegan et al. 2001a) and often struggles to find timber to fill orders. An indirect result of fuel reduction would be a long-term increase in timber supply. Mills and companies would likely use more of existing capacity and may bring additional capacity online (Adams 2002a). However, there would likely not be immediate or long-term increase in capacity to use pulpwood unless there was a substantial

increase in worldwide demand for pulp and paper products (Keetgan et al. 2001).

Harvesting and processing sawtimber would generate about nine full-time jobs per MMBF, and moving pulpwood to a landing and burning it would employ about 12 full-time workers per MMCF (BBER 2001a, BBER 2002a, BBER 2002b).

Conclusion

Mechanical fuels reduction would positively impact BLM's forests and the forest products industry in Montana and South Dakota. The sawlogs generated as a byproduct of hazardous fuel reduction would increase employment, boost labor income, and provide additional government revenue. Alternative B would increase employment and labor income by about three times as much as with Alternative A. Maintaining timber stand conditions (e.g., density, structure, and species composition) for continued fire resistance would also help provide a sustainable timber supply (Keegan et al. 2002).

3.23 Relationship Between Short-term Uses and Long-term Productivity

Fire is a critical natural process that helps maintain healthy ecosystems and guards against natural disasters.

While the total number of acres burned by wildland fire under either alternative may be essentially the same in the short term, eventually the severity of wildland fires will be reduced by a greater amount with Alternative B as hazardous fuels are reduced.

In some instances, trade-offs are made with prescribed burning. Some short-term negative effects on preferred species would occur to have desired results on species that are targets for removal (BLM, 1991, F-5). For example, controlled fires on rangeland can promote seasonal growth of forage and a mosaic of wildlife habitats, although grazing may have to be deterred immediately following the burn. In combination with pre-treatment where necessary, low-intensity fires in forestlands clear understory ladder fuels that could otherwise carry fires into tree tops and cause crown (or canopy) fires. Prescribed fires conducted under specified conditions would improve the health of the natural landscape and reduce the hazardous build-up of vegetation. Prescribed fires and other hazardous fuel reduction projects would help reduce the risk and devastation of catastrophic wildland fire.

Chapter 4.0: Consultation and Coordination

4.1 Public Notices, External and Internal Input

BLM consulted other resource management agencies as well as its partners in fire suppression to determine the appropriate approach to a fire management update.

Extensive public and internal input was also invited through letters to the public and meetings with BLM Field Office staff. Each Field Office identified a contact for this planning effort, and the project leader scheduled interdisciplinary team meetings with staff from each Field Office. During these meetings, Field Office staffs identified preliminary issues and special areas of concern; discussed appropriate methods of consultation and coordination; and discussed preliminary expectations for alternatives and impacts. These efforts are summarized below.

4.2 Consultation and Coordination

A Federal Register Notice of Intent to prepare a NEPA document and RMP amendments related to fire management planning was published (9/98).

Letters were sent to 115 federal, state, and local agencies to announce the fire management planning process and offering to coordinate as appropriate (10/21/98).

Agencies were contacted to identify issues and gather information. These included Northern Rockies Coordinating Representatives (3/18, 2/4/98), Forest Service (4/7/98), Montana Department of Fish, Wildlife, and Parks (MDFW&P) (4/16/98), Montana Fire Wardens (5/1-3/98), DNRC (5/1-3/98), Western States Air Resource Council (5/13-15/98), MDFW&P (5/18/98), and DNRC (5/18/98).

The BLM met with Black Hills National Forest to discuss opportunities for BLM/FS coordination around the South Dakota Exemption Area (11/1/00).

Consultation with the USFWS on the Biological Assessment (BA) indicated that a finding of May Affect and Is Likely to Adversely Affect was appropriate for some species. Formal consultation with the service was initiated on December 20, 2002.

5,067 letters were sent to the general public announcing the fire management planning process and asking for issues, concerns, and a response from those who want to stay on mailing list (10/98).

The MT congressional staffs were briefed about fire management planning (9/9/98). Briefings and materials were provided to the offices of the Congressional delegation (8/13/01).

Staffs of the SD Congressional delegation were briefed (8/16/01).

Letter sent to 48 fire wardens announcing the fire management planning process and asking for issues and concerns (10/30/98).

Letters sent to County Commissioners from each Field Office Manager announced fire management planning and offered to provide a briefing (10/98). Lewistown FO briefed Petroleum County Commissioners (12/2/98), Chouteau County Commissioners (12/7/98), Fergus County Commissioners (12/8/98), and Blaine County Commissioners (1/12/99). Lewistown FO sent letters, maps, and briefing statements to Hill County and Judith Basin County (12/98).

Responses from initial letters and contacts include: general public (524), agencies (47), counties (1), fire wardens (17), and county commissioners (6) (12/15/98). These people and agencies requested to be on the mailing list.

Field Office interdisciplinary team meetings with field specialists and managers included Billings (4/20/98, 5/28,29/02), SD (4/27/98, 6/17,18/02), Butte and Missoula (5/7/98), Dillon (5/26/98, 7/22/02), Lewistown, Great Falls, Malta (5/28/98, 6/10/02), Miles City, ND (6/10/98, 5/30,31/02), Missoula (6/3-5/02), Butte (6/6/02),

Communities at risk from wildland fire were identified for Montana and South Dakota, and the lists were sent to Montana DNRC (3/14/01) and South Dakota Department of Forestry (3/08/01) for coordination with other agencies. A final list of communities at risk in SD, ND, and MT was compiled and sent to each Field Office and the National Interagency Fire Center (NIFC) (3/21/01).

BLM Fire Management Officers (FMOs) completed fire risk assessments for Montana/Dakotas (4/9-13/01).

The Montana Association of Counties was briefed at the Mid-Winter Meeting in Helena Montana. Field Manager Tim Murphy discussed "The Federal Wildland Fire Policy and the Eastern Montana Experience" (2/24/99).

A fuels reduction coordination meeting in Lead, South Dakota included Interdisciplinary (ID) team members, representatives from BLM, Black Hills Power and Light, NIFC, the logging industry, SDRC, Lead Fire Dept., Homestake Mining Company, Lead Fire Chief, Lawrence County Fire Board, State of South Dakota Forestry, Pope and Talbot (10/31/00).

Fire management officers conducted fire risk assessment for Montana/Dakotas (4/9-13/01).

Internal BLM management briefings and meetings included BLM post fire conference (11/4/98), State Management Team (SMT) (12/15/98, 1/23/01, 7/26/01, 4/24/02, 5/02/02), spring Fire Operations Meeting (5/12/99), and State Director Briefing (3/17/03).

ID team developed preliminary guidelines for managing wildland fire and prescribed burning in sagebrush and other wildlife habitats (2/8/01).

Guidelines for identifying fuels reduction projects were sent to each Field Office (5/31/01).

The SMT endorsed additional meetings with field office resource specialists to comply with IM-2002-034 (4/24/02).

The Preliminary EA and Fire Management Plans were sent to each Field Office for internal review (6/8/01). Review comments were due (7/2/01). Briefing packages were sent to each Field Office (7/31/01). A conference call with Field Offices discussed the status and process for public review (8/2/01).

The Fire Management Plan/EA was sent to the public (8/10/01). Copies were distributed to the Lawrence County Fire Advisory Board (8/14/01). The Billings Gazette published a Notice of Availability (8/15/01). A Great Falls Tribune story and Notice of Availability of the Fire Management Plan was run (8/27/01). The original comment period ended (9/17/01). Cards were sent to mailing list explaining the comment period extension (9/21/01). The extended comment period ended (11/16/01).

4.3 Initial Public Input

Through letters and contacts with the public, agencies, and state and local officials, BLM asked for initial comments and concerns by November 30, 1998. Comments from the public included the following:

- Concerns about fuels build-up and suggestions for more timber sales
- Prescribed fire is a good management tool that should be used to manage ecosystems
- Prescribed burns should be used more often to control

fuels build-up and pine seedlings

- BLM should pay local fire departments to fight fires
- Dams should be fixed to provide a source of water to fight fires
- Farmers and ranchers should be allowed to fight fires
- BLM should provide more equipment

County commissioners and fire wardens expressed general interest in fire management planning and specific interest in fuels build-up around Lead, South Dakota.

4.4 Public Comments on the Fire Management Plan/Plan Amendment Environmental Assessment

During the August 2001 comment period following the release of the EA, the National Wildlife Federation requested a 60-day extension of the comment period in order to adequately review the Plan and contact specialists who might provide additional insight through comments. The Acting Associate State Director granted the extension and sent a card to those on the mailing list, explaining the extension and establishing the new deadline for submitting comments (November 16, 2001).

Fourteen letters were received by November 16. An additional 19 letters were received after the end of the comment period. Five letters were from agencies, six were from interest groups/organizations, and 22 were from individuals. All comments received have been considered.

A summary of the comments follows. The comments were grouped into four categories: NEPA Adequacy, Environmental Effects, Fuels Management, and Agency Comments.

4.4.1 Comment Summary

4.4.1.1 NEPA Adequacy

A number of the comments stated that the Environmental Assessment (EA) failed to adequately comply with all the NEPA guidelines and requirements. Some of the common concerns were:

- The need for action is not identified.
- The range of alternatives is too small.
- Analysis of potential impacts is incomplete.
- Cumulative impacts are not discussed.
- The best available science was not considered, used or cited in the analysis of impacts.

- The actions described in the EA are major federal actions and constitute an EIS.

Response: The need for the action is specified in section 1.2 Need for the Proposed Action. The two alternatives analyzed in this document represent alternative ways of meeting the purpose and need described in sections 1.1 and 1.2. The proposed action (Alternative B) was developed to respond to national policy and hazardous fuels conditions in Montana and the Dakotas. Alternative A (the no-action alternative) represents continuation of current management and provides a basis for comparison of alternatives and impacts. Some issues have been raised that are beyond the scope of this analysis. These are described in section 1.4.4 Issues eliminated from further study. Alternatives that would be tied to these issues were not analyzed because they were outside the scope of analysis or they were considered to be of speculative feasibility. Other alternatives emerged from internal analysis or from public comments.

These were carefully considered but eliminated from detailed study for the reasons summarized in section 2.4. Finally, some issues and concerns were raised that resulted in modifications to the proposed action. Modifying the proposed action was more appropriate than specifying and analyzing a new alternative. Specifying a separate alternative in response to those issues would result in alternative(s) with impacts that are indistinguishable from those impacts of the proposed action.

Analysis of environmental impacts, including cumulative impacts, has been revised in response to comments, additional information, and subsequent BLM guidance concerning fire and fuels management. References cited in comments have been studied. Revisions have been made to include relevant new and additional information where appropriate. See chapter 3 for analysis of environmental impacts.

No significant impacts were indicated by the impact analysis. Documentation, including the rationale for the Finding of No Significant Impact (FONSI), is attached at the end of this analysis.

4.4.1.2 Environmental Effects

Letters from groups and individuals were primarily concerned with the environmental effects of fuels management, and especially prescribed burning, on ecosystems, wildlife and their habitats, and wilderness areas.

Sagebrush Ecosystems and Sage Grouse Habitat

Each of the 22 letters from individuals addressed the plan's potential adverse effects on wildlife and their habitats. Ten of these letters specifically addressed the sagebrush ecosystem, and the wildlife species that depend on that ecosystem. The primary concern was over sage grouse, but

several letters mentioned the sage habitat's importance to pronghorn antelope, mule deer, and golden eagles.

This area of concern appeared in 14 of the comment letters. Some cited historically low fuel loads in sage/grassland habitats, and questioned the need for fuels management in these land cover types. Other comments addressed the adequacy of the effects analysis.

"The plan proposes to ignite 'prescribed' fires on public lands in several western states, which would cause the needless destruction of millions of acres of already dwindling sage/grassland habitat."

Six of the 14 letters also stated that adverse effects on the sage grouse could require their listing under the Endangered Species Act.

"...this action has the potential to adversely affect sage grouse, and possibly result in the need for listing under the ESA."

Two comment letters referred to the Western Association of Fish and Wildlife Agencies (WAFWA) Memorandum of Understanding signed by the BLM. The WAFWA MOU was not mentioned in the EA and no reason was provided for the departure from the WAFWA guidelines for sage grouse conservation.

Another concern expressed was whether or not prescribed burning would be beneficial in sagebrush ecosystems. A letter challenged the conclusion in the EA stating that the long-term benefit of burning sagebrush ecosystems is greater perennial grass production. A study of big sagebrush ecosystem recovery by C.L. Wambolt et. al. is cited.

"The Wambolt research would indicate that the benefits of fire to forage production are short-term while having long term detrimental effects on sagebrush obligates."

Response: BLM responded to these comments by clarifying the following portions of the EA:

- **Anticipated Level of Activity:** It is anticipated that 3 percent or less of BLM shrublands would be treated with prescribed fire or mechanical treatments. Also only a portion of these shrublands would be sagebrush.
- **Management Common (section 2.5.1)** clarifies the intent of treating shrublands.
- **Purpose and Need** indicates that Condition Class 2 and 3 areas would be the primary focus of fuels reduction treatments.

A description of the affected environment of terrestrial species and habitat as well as environmental consequences is available in section 3.2. This includes analysis of sagebrush ecosystems and sage grouse habitat. The impact

analysis is based on the anticipated fire suppression actions and fuel reduction treatments on 3 percent or less of shrublands per decade with either alternative. The primary purpose of these treatments would be to control encroaching conifers. See the description of treatments in section 3.1.1.3.

Wilderness

One of the letters expressed concern over how some of the forest acres were categorized. It was stated that more acres could have been categorized under Categories C and D, which allows for more prescribed fire use and wildfire may be desired.

"It would have been ideal to have more acreage fall into the Category C and D, where wildfires will be allowed to burn, and prescribed fire would have a large role."

One of the letters that expressed concern over the use of prescribed fire in sagebrush ecosystems commented specifically in support of the conclusions contained in comment letter #8.

"We feel there is a much more significant ecological role for fire in forest habitats comprised of fire adapted species in contrast to shrub-steppe habitats where climax species such as sagebrush are killed by fire. We would support an analysis of more prescribed fire and less fire suppression in forested wilderness and wilderness study areas."

Another letter expressed that wild, untouched forested areas have more natural defenses to fire than developed areas. It was stated that fire suppression or fuels reduction activities could increase fire severity in these areas.

Response: WSA polygon categories were re-evaluated to determine whether natural ignitions could be allowed to burn in wildland areas. The categorization of one polygon (which included three WSAs) was changed from B to C. Reasons for not changing the categorization of other fire management zones are described in section 2.4.2.

An estimated 85 percent of forestlands in Montana are in condition class 2 or 3. It is anticipated that with both alternatives, over 60 percent of all the areas treated would be forestlands compared to less than 17 percent for shrublands.

Vegetation

One comment letter suggested a more specific discussion of the various vegetation types present in Montana and the Dakotas and how they respond to fire.

"No descriptions, analysis or even conclusions are presented concerning the anticipated effects of Alternatives A and B on grasslands, shrublands and forestlands."

Response: See section 3.2. Grasslands are analyzed in section 3.2.1, shrublands are analyzed in section 3.2.2, and forestlands are analyzed in section 3.2.3.

Wildlife

The same letter indicated that the EA's discussion on wildlife including T&E and BLM sensitive species was also inadequate, and should be more specific to Montana.

"The discussion of effects on fish and wildlife should address how the alternatives might be expected to affect the distribution and abundance of habitats for these [mule deer] and other species."

As discussed above, all 22 comment letters from individuals addressed wildlife. Ten of the 22 specifically mentioned sagebrush ecosystems and species, and the remaining 12 expressed concern over potential adverse effects on wildlife and their habitats. Eleven of these letters identified that an EIS is the desired level of analysis.

Response: The affected environment and anticipated environmental consequences on aquatic habitats and species are analyzed in section 3.6, terrestrial species and habitats (including Special Status Species) are analyzed in section 3.7, and federally threatened, endangered, and proposed species are analyzed in section 3.8.

4.4.1.3 Fuels Management

The EA proposes to reduce hazardous fuels by prescribed fire, mechanical and other means. Comments regarding fuels management ranged from questioning the need for fuels management in some areas to stating that the EA should more clearly indicate guidance on where and what type of fuels management would be used.

Another letter indicated that it is structure ignitability that is responsible for structure loss and not fuels buildup. The letter states,

"The NEPA document must provide scientific support that vegetation treatments will decrease susceptibility to wildfires."

The same letter continued,

"An unnatural fire policy (even on grasslands) could prevent fire from playing its natural role, and may turn out to be just another ill-conceived form of vegetation manipulation."

An organization expressed concern with the discussion about what types of fuels treatments would be used and some suggestions were made.

“The EA vaguely refers to a number of actions that could be taken to reduce fuels.”

“Thinning [in ponderosa pine forests] may improve forest structure and productivity, benefit wildlife habitat and reduce some fire risk.”

The letter also indicated that thinning may not be necessary in high elevation forests and that the BLM field offices should received guidance on how best to use fuels treatments in a variety of habitat types.

Response: The need to reduce hazardous fuels is a major component of the National Fire Plan. See section III (Key Elements of the Administration’s Wildland Fire Management Policy), subsection B (Reducing Hazardous Fuel Accumulations) of *A Report to the President in Response to the Wildfires of 2000* (<http://www.fireplan.gov/president.cfm>). This section references several examples where fuels treatments mitigated the severity of wildfires that later occurred on treated areas, including an example from the Jasper Fire in South Dakota.

Table 4 and 5 indicate the anticipated levels and types of treatments (prescribed fire, mechanical, and chemical weed treatments) that may be used within the different fire management categories and on different types of vegetation. This is also used as a basis for impact analysis.

Specific decisions on where and how fuels treatments would be used will be made at the project level.

4.4.1.4 Agency Comments

Comments from other agencies focused primarily on how their management directions would be affected by actions described in the BLM’s Fire Management Plan/Plan Amendment Environmental Assessment. Some of the agencies also provided clarification on boundaries and “on the ground” conditions, and suggested adjustments where appropriate. For example, one agency comment questioned the need for prescribed burning in the Missouri River Breaks Uplands fire management zone, which is managed by the Malta Field Office.

“Another justification for prescribed burning in the Missouri Breaks Uplands is to create a mosaic of habitat types to benefit wildlife; however, such a mosaic already exists as stated in your Area Description.”

One agency comment was similar to those comments described in sections 4.4.1.1 and 4.4.1.2, regarding NEPA adequacy and potential effect on the sage grouse. Specifically, the comment indicated that increasing use of prescribed fire could represent a possible significant impact on the human environment, and that an EIS-level analysis may be more appropriate based on potential effects on wildlife species and sage grouse in particular.

The agency indicated that effects of the proposed action could not be determined without knowing the locations of priority interface areas referenced in the EA.

Response: See response to comments in sections 4.4.1.1 and 4.4.1.2. Map 2 shows communities/areas at risk from wildland fire that are near BLM lands.

4.5 Public Comments on Revised EA

The EA was revised and re-released for public review and comment in May 2003. BLM received four comments on the revised EA. These comments are summarized below.

The Montana State Historic Preservation Officer suggested clarifications to the resource protection guidance included in the proposed action (section 2.5.3.1).

The Montana Department of Transportation clarified the notification requirements if MDT rights-of-way are needed for access during projects.

Montana Fish, Wildlife & Parks noted concern with burning in sagebrush-grassland in relation to the needs of sage grouse, pygmy rabbits, and other obligates of the sagebrush steppe habitat type. FWP acknowledged the reference to BLM’s Special Status Species policy, which is to “ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for listing a candidate or BLM sensitive species under the Endangered Species Act.”

Stephen J. Flynn, Resource Manager of Louisiana-Pacific Corporation, commented that the RPZ recommendation included in Alternative B is excessive, and that the Streamside Management Zone is adequate.

Response: Slight modifications were made to the guidance (section 2.5.3.1) to respond to the comments from the MT SHPO. The RPZ concept was included in the design features under Alternative B to avoid significant impacts to aquatic resources. See section 3.6 and Appendix D for the rationale for including RPZ approaches in the proposed action.

Glossary

affected environment- The natural environment that exists at the present time in an area being analyzed.

allowable sale quantity (ASQ)- The amount of timber expected to be sold within a certain time period from an area of suitable land. ASQs are usually stated to give the commercial timber industry an indication of the annual amount of commercial forest products that it can anticipate from federal lands.

alternative – A combination of management prescriptions applied in specific amounts and locations to achieve a desired management emphasis as expressed in goals and objectives.

aspect- The direction a slope faces. A hillside facing east has an eastern aspect.

best management practices (BMP) - A practice or a combination of practices, that is determined by a State (or designated area-wide planning agency) after problem assessment, examination of alternative practices, and appropriate public participation to be the most effective, practical means of preventing or reducing the amount of pollution generated by non-point sources to a level compatible with water quality goals (40 CFR 130.2g).

big game- Large mammals, such as deer, elk, and antelope that are hunted for sport.

biological assessment (BA) - A stand alone document which reviews BLM planned, funded, executed or permitted programs and activities for possible effects on Federally listed threatened, endangered, proposed and candidate species as identified for the cumulative effects area in coordination with the USFWS . A Biological Assessment is used to satisfy consultation requirements with the USFWS for projects requiring an Environmental Assessment (EA). The Biological Assessment displays the Determination of Effects for the preferred alternative. The Determination of Effects is limited to: (1.) No Effect; (2) Not likely to adversely affect; (3) Likely to adversely affect; and (4) Beneficial effect.

Biological Opinion- Document which includes (1) the opinion of the US Fish and Wildlife Service as to whether or not a federal action is likely to jeopardize the continued existence of a listed species, or result in the destruction or adverse modification of designated critical habitat; (2) summary of the information on which the opinion is based; and (3) a detailed discussion of the effects of the action on listed species or designated critical habitat.

biological diversity- The number and abundance of species found within a common environment. This includes the

variety of genes, species, ecosystems, and the ecological processes that connect everything in a common environment.

browse- Twigs, leaves, and young shoots of trees and shrubs that animals eat. Browse is often used to refer to the shrubs eaten by big game, such as elk and deer.

candidate species - A species being considered for listing as a federally endangered or threatened species.

canopy- The part of any stand of trees represented by the tree crowns. It usually refers to the uppermost layer of foliage, but it can be use to describe lower layers in a multi-storied forest.

chemical treatment- The use of pesticides and herbicides to control pests and undesirable plant species.

climax- The culminating stage in plant succession for a given site. Climax vegetation is stable, self-maintaining, and self-reproducing.

coarse filter management- Land management that addresses the needs of all associated species, communities, environments, and ecological processes in an area; as opposed to fine filter management, which focuses only on the needs of a few species.

Condition Class- Condition classes are a function of the degree of departure from historical fire regimes resulting in alterations of key ecosystem components such as species composition, structural stage, stand age, and canopy closure. One or more of the following activities may have caused this departure: fire exclusion, timber harvesting, grazing, introduction and establishment of exotic plant species, insects and disease (introduced or native), or other past management activities.

Condition Class 1 – Attributes: Fire regimes are within or near an historical range. The risk of losing key ecosystem components is low. Fire frequencies have departed from historical frequencies by no more than one return interval. Vegetation attributes (species composition and structure) are intact and functioning within an historical range.

Condition Class 2 – Attributes: Fire regimes have been moderately altered from their historical range. The risk of losing key ecosystem components has increased to moderate. Fire frequencies have departed (either increased or decreased) from historical frequencies by more than one return interval. This results in moderate changes to one or more of the following: fire size,

frequency, intensity, severity, or landscape patterns. Vegetation attributes have been moderately altered from their historical range.

Condition Class 3 – Attributes: Fire regimes have been significantly altered from their historical range. The risk of losing key ecosystem components is high. Fire frequencies have departed from historical frequencies by multiple return intervals. This results in dramatic changes to one or more of the following: fire size, frequency, intensity, severity, or landscape patterns. Vegetation attributes have been significantly altered from their historical range.

conifer- A tree that produces cones, such as a pine, spruce, or fir tree.

cover- Any feature that conceals wildlife or fish. Cover may be dead or live vegetation, boulders, or undercut streambanks. Animals use cover to escape from predators, rest, or feed.

critical habitat- Areas designated for the survival and recovery of federally listed threatened or endangered species.

crown closure- What percent of tree canopies that are touching. When stands have 100 percent crown closure limited to no light reaches the forest floor. See canopy.

crown height- The distance from the ground to the base of the crown of a tree.

cultural resource- The remains of sites, structures, or objects used by people in the past; this can be historical or pre-historic.

cumulative effects - Effects on the environment that result from separate, individual actions that, collectively, may become significant over time.

deciduous- Shedding foliage at the end of the growing season.

Decision Record (DR) – The decision document associated with an Environmental Assessment (EA)-level analysis.

density- Number of trees in an area, generally measured as trees per acre.

developed recreation- Recreation that requires facilities that, in turn, result in concentrated use of the area. For example, campgrounds require roads, picnic tables, and toilet facilities.

direct effects - Effects on the environment which occur at the same time and place as the initial cause or action.

dispersed recreation- Recreation that does not occur in a developed recreation site, such as hunting, backpacking, and scenic driving.

displacement - As applied to wildlife, forced shifts in the patterns of wildlife use, either in location or timing of use.

disturbance- Any event, such as forest fire or insect infestations that alter the structure, composition, or functions of an ecosystem.

ecology- The interrelationships of living things to one another and to their environment, or the study of these interrelationships.

ecosystem- An arrangement of living and non-living things and the forces that move among them. Living things include plants and animals. Non-living parts of ecosystems may be rocks and minerals. Weather and wildfire are two of the forces that act within ecosystems.

edge effect–The richness of flora and fauna occurring in a transition zone where two plant communities or successional states meet and mix (USDA, 1988).

effects - Physical, biological, social and economic results (expected or experienced) resulting from achievement of outputs. Effects can be direct, indirect and cumulative and may be either beneficial or detrimental. (See Impacts)

encroachment— The progression of trees from forested areas into grassland or shrubland.

endangered species- A plant or animal that is in danger of extinction throughout all or a significant portion of its range. Endangered species are identified by the Secretary of the Interior in accordance with the Endangered Species Act of 1973.

Environmental Assessment (EA) - A statement of the environmental impacts of a proposed action and alternatives to it.

escape cover- Vegetation of sufficient size and density to hide an animal, or an area used by animals to escape from predators.

fauna-The animal life of an area.

fire-adapted – Having evolved strategies that that allow populations to be maintained on sites where fires commonly occurred.

fire cycle- The average time between fires in a given area.

fire, types: <http://www.nifc.gov/fireinfo/glossary.html>

Spot Fire – A fire ignited outside the perimeter of the main fire by flying sparks or embers.

Torching – The ignition and flare-up of a tree or small group of trees, usually from bottom to top.

Crown Fire (Crowning) – The movement of fire through the crowns of trees or shrubs more or less independently of the surface fire.

Fire management – includes fire suppression, fire use, and prescribed fire.

Fire management plan – Strategic plans that define a program to manage wildland and prescribed fires based on approved land management plans.

fire regime- The characteristics of fire in a given ecosystem, such as the frequency, predictability, intensity, and seasonality of fire.

Fire use – The management of naturally ignited wildland fire to accomplish specific pre-stated resource management objectives in predefined geographic areas outlined in approved Fire Management Plans.

flora- The plant life of an area.

forage- All browse and non-woody plants that are eaten by wildlife and livestock.

forb- A broadleaf plant that has little or no woody material in it.

forest health- A measure of the robustness of forest ecosystems. Aspects of forest health include biological diversity; soil, air, and water productivity; natural disturbances; and the capacity of the forest to provide a sustaining flow of goods and services for people.

fragmentation- The splitting or isolating of patches of similar habitat, typically forest cover, but including other types of habitat. Habitat can be fragmented naturally or from forest management activities, such as clearcut logging.

fuel- combustible plant material, both living and dead that is capable of burning in a wildland fire situation.

fuel break – A zone in which fuel quantity has been reduced or altered to provide a position for suppression forces to make a stand against wildfire. Used for suppression safety and fire behavior modification. Fuel breaks may consist of one or a combination of the following: Natural barriers, constructed fuel breaks, manmade barriers. The effectiveness of fuel breaks is improved when strategically located adjacent to areas containing low fuel accumulation (Tons/Acre). In the long-term fuel breaks are more effective when

managed to maintain a low fuel loading. Tools used for fuel break maintenance include mechanical treatment, prescribed burning, and grazing.

fuels management- The treatment of fuels that would otherwise interfere with effective fire management or control. For instance, prescribed fire can reduce the amount of fuels that accumulate on the forest floor before the fuels become so heavy that a natural wildfire in the area would be explosive and impossible to control.

fuels treatment – The rearrangement or disposal of natural or activity fuels to reduce fire hazard.

game species- Any species of wildlife or fish that is harvested according to prescribed limits and seasons.

Geographic Information Systems (GIS) - GIS is both a database designed to handle geographic data as well as a set of computer operations that can be used to analyze the data. In a sense, GIS can be thought of as a higher order map.

habitat - A place where a plant or animal naturally or normally lives or grows.

hiding area/cover- Vegetation capable of hiding 90 percent of an adult elk or deer from human's view at a distance of 200 feet or less.

interdisciplinary team- A team of individuals with skills from different disciplines that focuses on the same task or project, often referred to as an ID Team.

irretrievable- A category of impacts mentioned in the National Environmental Policy Act. An irretrievable effect applies to losses of production or commitment of renewable natural resources.

irreversible- A category of impacts that applies to non-renewable resources, such as minerals and archaeological sites. Irreversible effects can also refer to effects of actions that can be renewed only after a very long period of time.

ladder fuels- Vegetation located below the crown level of forest trees which can carry fire from the forest floor to tree crowns. Ladder fuels may be low-growing tree branches, shrubs, or smaller trees.

mechanical treatment – Relative to this analysis, the manipulation of fuels by mechanical and manual means. Mechanical treatments use machinery, manual treatments use hand-held tools such as chainsaws.

mesic- Land conditions that are moist in nature.

mineral soil- Soil that consists mainly of inorganic material, such as weathered rock.

mitigation- Actions taken to avoid, minimize, or rectify impacts of a land management practice; reducing or eliminating the impact by preservation and maintenance operations.

mosaic- Areas with a variety of plant communities over a landscape, such as areas with trees and areas without trees occurring over a landscape.

multi-story- A vertical arrangement of 3 or more canopy layers within the same area.

National Fire Plan – A national plan of action that directs the USDA Forest Service and the Departments of the Interior to prepare for wildland fires and reduce their impacts on people and resources. The National Fire Plan is based on the five key points of firefighting, rehabilitation and restoration, hazardous fuel reduction, community assistance, and accountability.

NEPA (National Environmental Policy Act) - Congress passed NEPA in 1969 to encourage productive and enjoyable harmony between people and their environment. One of the major tenets of NEPA is its emphasis on public disclosure of possible environmental effects of any major action on public lands.

No Action alternative - An alternative that maintains established trends or management direction.

non-commercial vegetative treatment- The removal of trees for reasons other than commercial purposes.

nongame- Wildlife species that are not hunted for sport.

nonpoint source pollution- Pollution whose source is not specific in location. The sources of the discharge are dispersed, not well defined, or constant.

notice of intent- A notice in the federal register of intent to prepare an environmental analysis on a proposed action.

noxious weed - According to the Federal Noxious Weed Act (PL 93-629), a weed that causes disease or has other adverse effects on man or his environment and therefore is detrimental to the agriculture and commerce of the United States and to the public health. Identified by designation in Montana.

overstory- The upper canopy layer; the plants below comprise the understory.

permitted grazing- Grazing on public lands under the terms of a grazing permit.

precommercial thinning- A felling made in an immature stand to improve the average form of the trees that remain.

predator- An animal that lives by preying on other animals

prescribed fire- Fire set intentionally in wildland fuels under prescribed conditions and circumstances.

prescription- Management practices to accomplish specific land and resource management objectives.

public land- Land for which title and administration rests with the Bureau of Land Management (BLM).

rangeland- Land on which the principle natural plant cover is composed of native grasses, forbs, and shrubs that are valuable as forage for livestock and big game.

raptor- A bird of prey, such as a eagle or hawk.

reforestation- The restocking of an area with forest trees, by either natural or artificial means.

regeneration- The renewal of a tree crop by either natural or artificial means.

artificial – Restocking an area with forest trees by planting seedlings not grown on site but of native origin.

natural – Restocking an area with forest trees from seeds that fall from existing trees on the site.

delayed-natural – Restocking an area with forest trees from natural seeds that fall from existing trees on the site over long time periods (5 to 100 years or more). Existing seed source is not available to restock within 5 years. Reforestation will progress over a span of time (5 to 100 or more years) from the existing seed source, as new seedlings will have to grow for 40 to 80 years and cast more seed.

Resource Management Plan (RMP) – A planning document for an administrative units managed by the Bureau of Land Management that provides general guidance and direction for land management activities within that administrative unit.

restoration (of ecosystems)- Actions taken to modify an ecosystem to achieve a desired, healthy, and functioning condition.

revegetation- The re-establishment and development of a plant cover by either natural or artificial means, such as re-seeding.

riparian – Areas with distinctive resource values and characteristics that are comprised of an aquatic ecosystem and adjacent upland areas that have direct relationships with the aquatic system. This includes floodplains, wetlands, and

all areas within a horizontal distance of approximately 100 feet from the normal high waterline of a stream channel, or from the shoreline of a standing body of water.

riparian ecosystem- The ecosystems around or next to water areas that support unique vegetation and animal communities as a result of the influence of water.

Review and Update of the 1995 Federal Wildland Fire Management Policy (2001 Federal Fire Policy)- A policy that finds and recommends that federal fire management activities and programs are to provide for firefighter and public safety, protect and integrate land management objectives and human welfare, integrate programs and disciplines, require interagency collaboration, emphasize the natural ecological role of fire, and contribute to ecosystem sustainability.

salvage harvest – The cutting of trees that are dead, dying, or deteriorating (i.e. because they are damaged by fire or insects) before they lose their commercial value as sawtimber.

savannah- A grassland that has scattered individual trees.

sawtimber- Trees containing at least one 12 foot sawlog or two noncontiguous 8 foot logs, and meeting regional specifications for freedom from defect. Softwood trees must be at least 8 inches in diameter and hardwood trees 11 inches in diameter at breast height.

Section 202 – A Wilderness Study Area (WSA) that is being studied under authority of Section 202 of the Federal Land Policy and Management Act of 1976. FLPMA requires recurrent land-use planning by the Bureau of Land Management.

sediment – Solid material, both mineral and organic, that is in suspension, being transported, or has been moved from its site of origin by air, water, gravity, or ice.

Special Status Species – A group that includes five classes of plants and animals: A.- Federally Listed Threatened and Endangered Species and Designated Critical Habitats; B. – Federally Proposed Species and Proposed Critical Habitats; C. – Candidate Species; D. – State Listed Species; and E. – BLM Sensitive Species.

seral- The stage of succession of a plant or animal community that is transitional. If left alone, the seral stage will give way to another plant or animal community that represents a further stage of succession.

silviculture- The art and science that promotes the growth of single trees and the forest as a biological unit.

stand- A group of trees that occupies a specific area and is similar in species, age, and condition.

stand replacement- When a stand has been totally modified by some disturbance (fire, insects, disease, logging), and needs to start, or be started, over.

structure- How the parts of ecosystems are arranged, both horizontally and vertically. Structure might reveal a pattern, or mosaic, or total randomness of vegetation.

successional stage - A stage of development of a plant community as it moves from bare ground to climax. The grass-forb stage of succession precedes the woody shrub stage.

succession- The natural replacement, in time, of one plant community with another. Conditions of the prior plant community (or successional stage) create conditions that are favorable for the establishment of the next stage.

suppression – Any act taken to slow, stop, or extinguish a fire. Examples of suppression activities include fireline construction, backfiring, and application of water or chemical fire retardants.

sustainability- The ability of an ecosystem to maintain ecological processes and functions, biological diversity, and productivity over time.

temporary road –Temporary roads are used for a single, short-term use, i.e. to haul timber to developed roads, access to build water developments or conduct other administrative functions, etc.

thinning- A cutting made in an immature stand of trees to accelerate growth of remaining trees or to improve the form of the remaining trees.

threatened species- Those plant or animal species likely to become endangered throughout all or a specific portion of their range within the foreseeable future as designated by the U.S. Fish and Wildlife Service under the Endangered Species Act of 1973.

Total Maximum Daily Loads (TMDL)- A requirement (Clean Water Act 303 (d)) that establishes the maximum allowable loading for each pollutant for a waterbody to meet water quality standards and allocates that load among polluting contributors.

type conversion- The conversion of the dominant vegetation in an area from forested to non-forested or from one species to another.

underburn- A burn by a surface fire that can consume ground vegetation and “ladder” fuels.

understory- The trees and woody shrubs growing beneath the overstory in a stand of trees.

understory burn- A type of burn designed to reduce fuel accumulations beneath an overstory tree canopy and be designed to achieve specified levels of site preparation.

vegetation management- Activities designed primarily to promote the health of forest vegetation for multiple-use purposes.

vegetation type- A plant community with distinguishable characteristics.

Visual Resource Management (VRM) Class I areas (including all Wilderness and Wilderness Study Areas (WSAs) unless specifically exempted in an RMP) – To preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and must not attract attention.

VRM Class II areas – To retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color and texture found in the predominant natural features of the characteristic landscape.

VRM Class III areas – The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

VRM Class IV areas – To provide for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful

location, minimal disturbance and repeating the basic elements.

watershed- The entire region drained by a waterway (or into a lake or reservoir). More specifically, a watershed is an area of land onto which rain falls and is subsequently stored in soil then released down slope to a stream. Watersheds are divided by topographic features.

wetlands- Those areas that are inundated by surface or ground water with a frequency sufficient, under normal circumstances, to support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands include marshes, bogs, sloughs for growth and reproduction. Wetlands include marshes, bogs, sloughs, potholes, river overflows, mud flats, wet meadows, seeps, and springs.

Wild and Scenic Rivers: Management designation that currently applies to the Upper Missouri Wild and Scenic River. Eligible river segments meet determinations of being free-flowing and having adjacent land area possessing at least one river-related value considered to be outstandingly remarkable.

Wildland fire- Any wildland fire that is not a prescribed fire.

Wildland Urban Interface (WUI) – The line, area, or zone where structures and other human developments meet or intermingle with undeveloped wildland or vegetative fuels.

wildlife habitat diversity- The distribution and abundance of different plant and animal communities and species within a specific area.

Woody debris - The residue left on the ground after a fire, storm, timber cutting, or other event. Woody debris includes unused logs, uprooted stumps, broken or uprooted stems, branches, bark, etc.

woody draw- A classification of areas, particularly in grassland settings, where an overstory of woody vegetation in small drainages creates habitat for many wildlife species and shade/wind protection and forage for livestock. The vegetation is a result of higher moisture conditions than in the surrounding areas but surface water if any, running thru the areas is generally short term.

xeric- Land conditions that are dry in nature.

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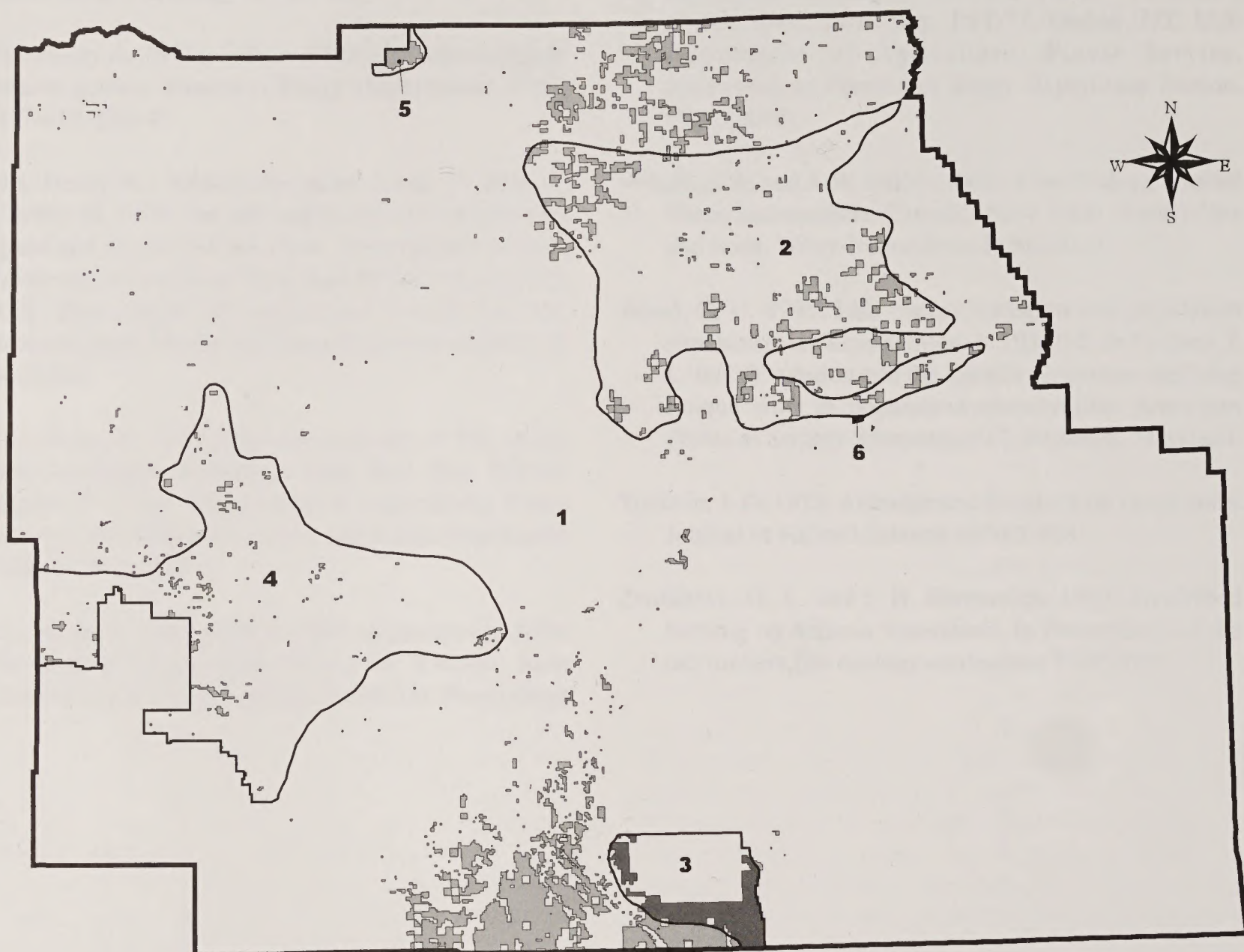
Appendix A—Maps of Fire Management Zones Under the Proposed Action



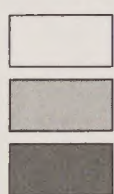
MAP 3

FIRE MANAGEMENT ZONES AND CATEGORIES OF BLM LANDS

(Billings Field Office)



FIRE MANAGEMENT CATEGORIES OF BLM LANDS



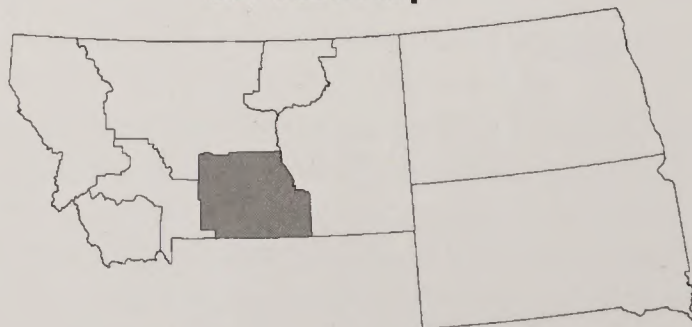
NON-BLM
LANDS
B
C

30 0 30 60 Miles

FIRE MANAGEMENT ZONE AND CATEGORY

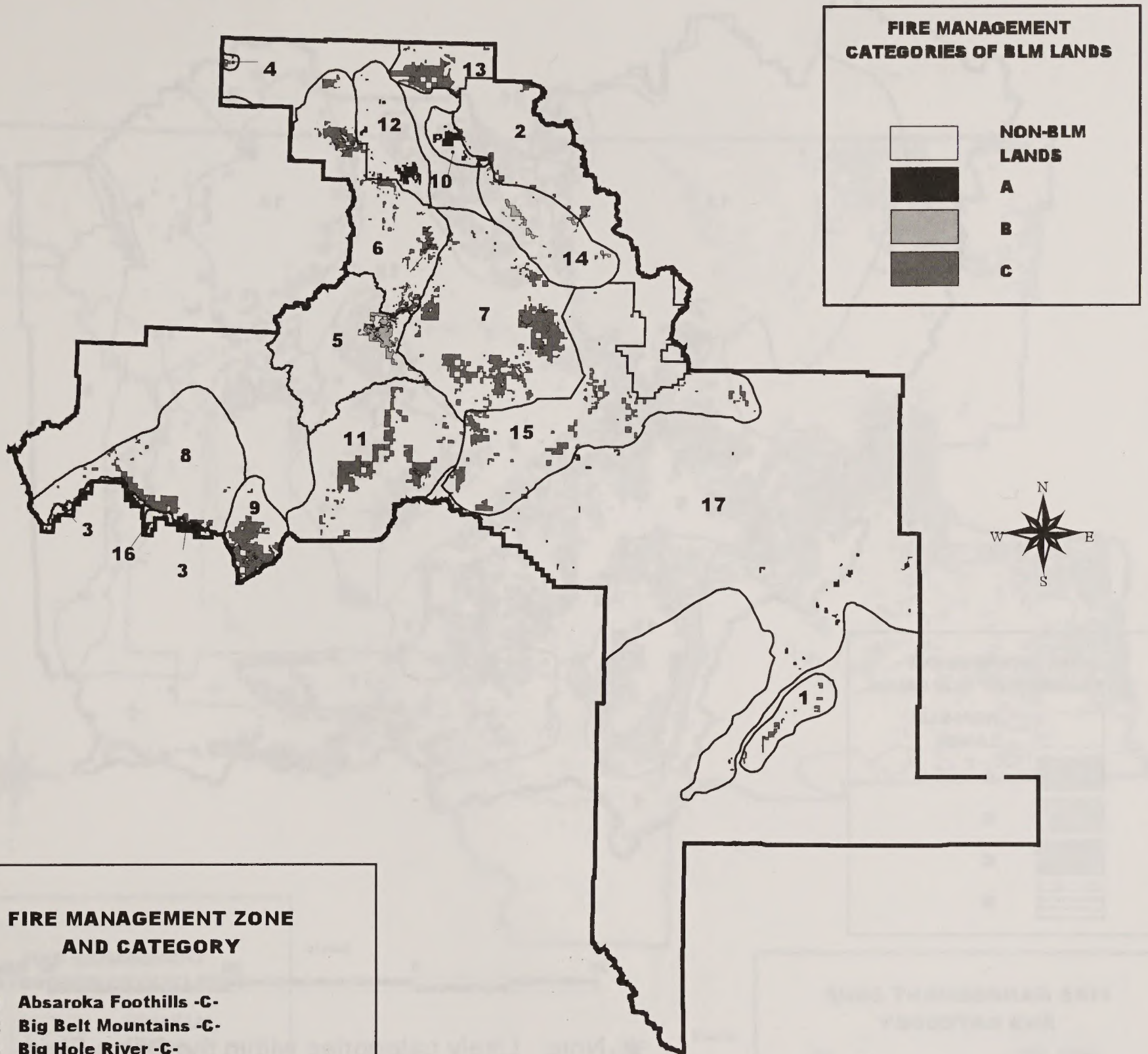
- 1 Billings Grasslands -B-
- 2 Roundup -B-
- 3 Pryor Mountains -C-
- 4 Big Timber-Absaroka -B-
- 5 Twin Coulee WSA -B-
- 6 Pompeys Pillar -B-

Location Map



MAP 4

FIRE MANAGEMENT ZONES AND CATEGORIES OF BLM LANDS (Butte Field Office)

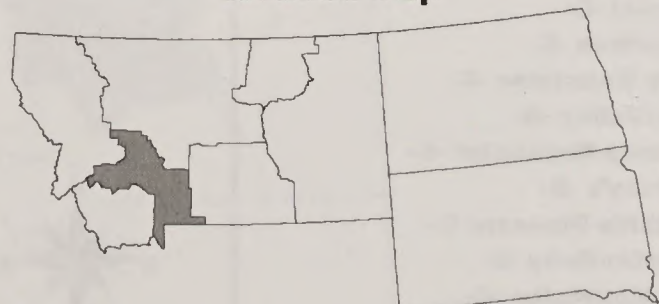


FIRE MANAGEMENT ZONE AND CATEGORY

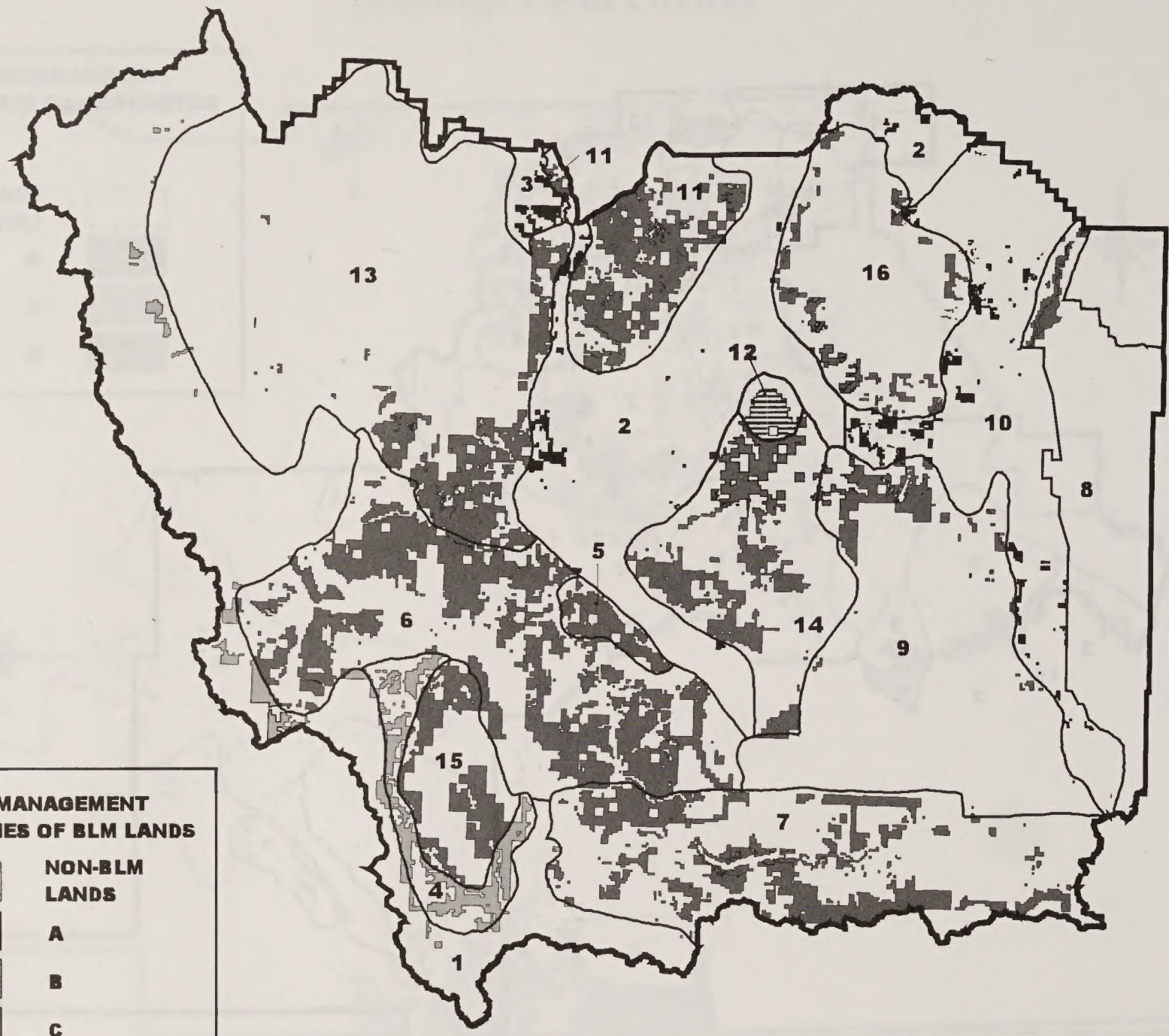
- 1 Absaroka Foothills -C-
- 2 Big Belt Mountains -C-
- 3 Big Hole River -C-
- 4 Blackfoot-C-
- 5 Boulder River -B-
- 6 Clancy-Marysville -C-
- 7 Elkhorn Mountains -C-
- 8 Fleecer Mountains -C-
- 9 McCartney-Rochester-C-
- 10 North Hills -B-
- 11 Pipestone -C-
- 12 Scratchgravel Hills --B-
- 13 Sleeping Giant-Sheep Creek -C-
- 14 Spokane Hills and North -B-
- 15 Three Forks -C-
- 16 Wise River Townsite-B-
- 17 Bozeman-Livingston
Scattered Tracts -A-

30 0 Scale 30 60 Miles

Location Map



MAP 5 **FIRE MANAGEMENT ZONES AND CATEGORIES OF BLMLANDS** * (Dillon Field Office)



FIRE MANAGEMENT CATEGORIES OF BLM LANDS

NON-BLM LANDS

A

B

C

D

FIRE MANAGEMENT ZONE AND CATEGORY

1

Beaverhead Mountains -B-

2

Beaverhead-Jefferson -A-

3

Big Hole RiverCorridor -C-

4

Big Sheep-Medicine Lodge -B-

5

Blacktail Mountains -C-

6

Blacktail-HorsePrairie -C-

7

Centennial -C-

8

East Madison -C-

9

Gravelly Mountains -C-

10

MadisonValley -A-

11

Mc Cartney-Rochester -C-

12

North Ruby's -D-

13

SE Foothills-Pioneers C-

14

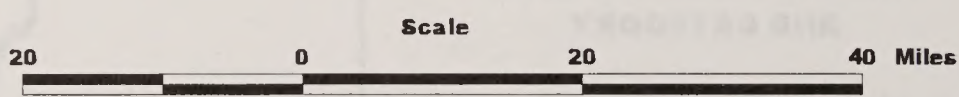
Sweetwater-Ruby -C-

15

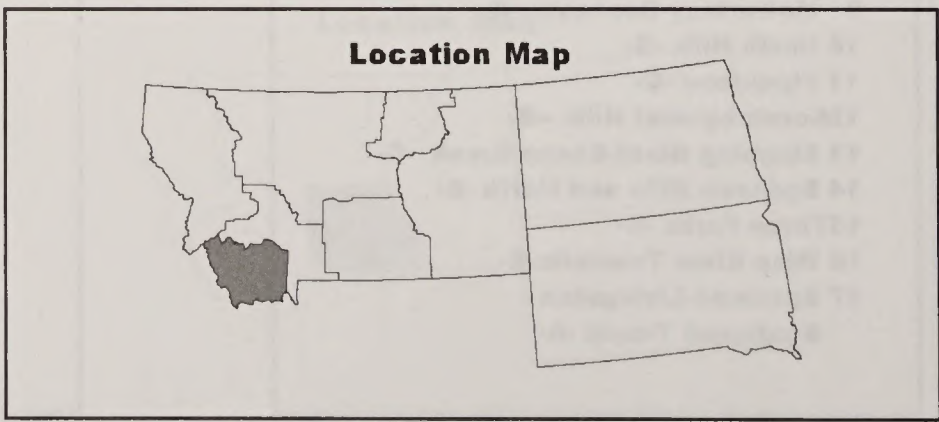
Tendoy Mountains -C-

16

Tobacco Root Mountains -C-



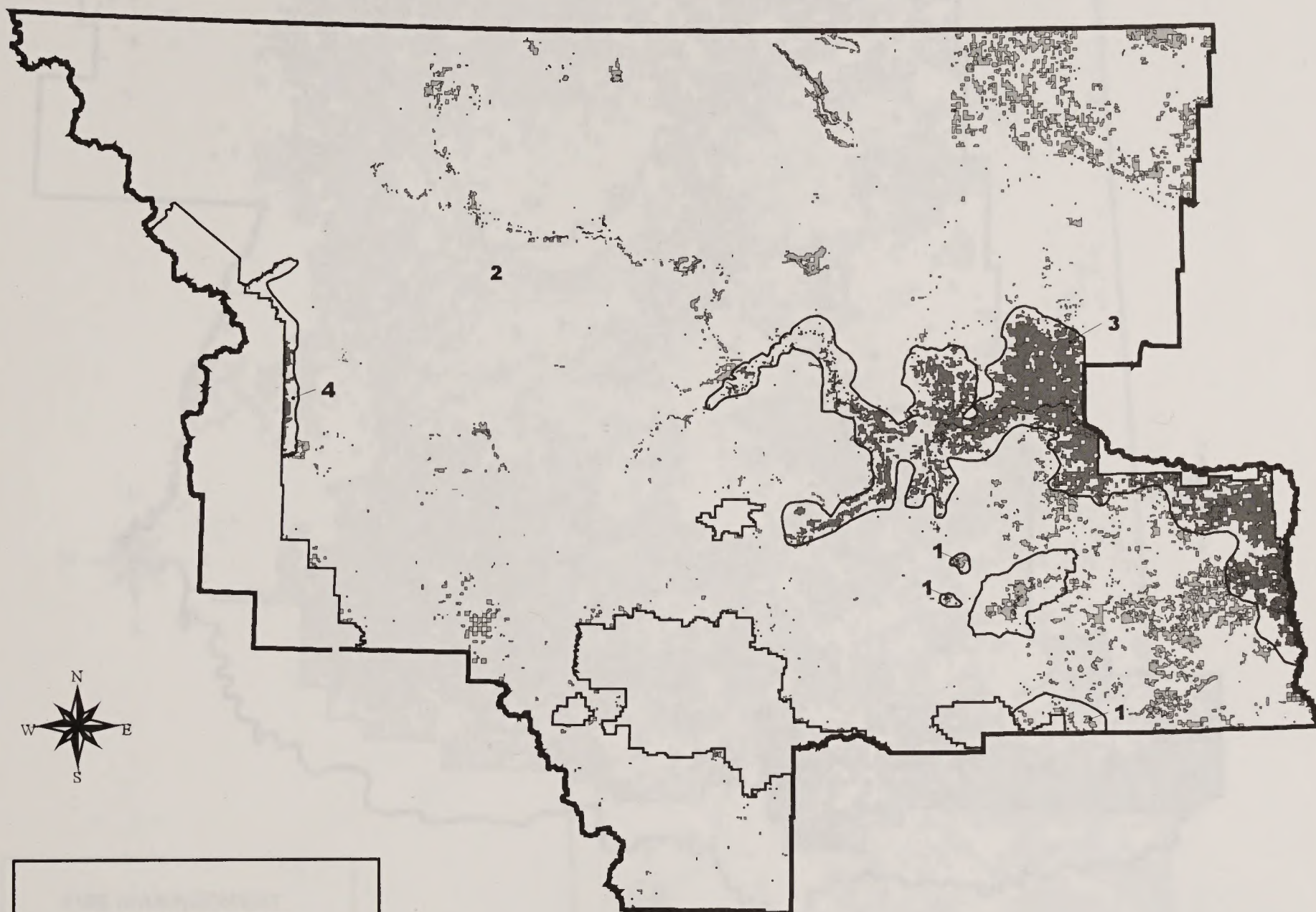
* Note: Likely categories within the Dillon Field Office. Final category decisions will be made in the Dillon RMP/EIS.



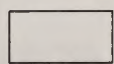
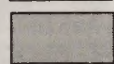
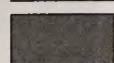
MAP 6

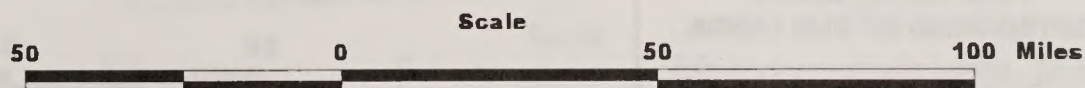
FIRE MANAGEMENT ZONES AND CATEGORIES OF BLM LANDS

(Lewistown Field Office)



FIRE MANAGEMENT CATEGORIES OF BLM LANDS

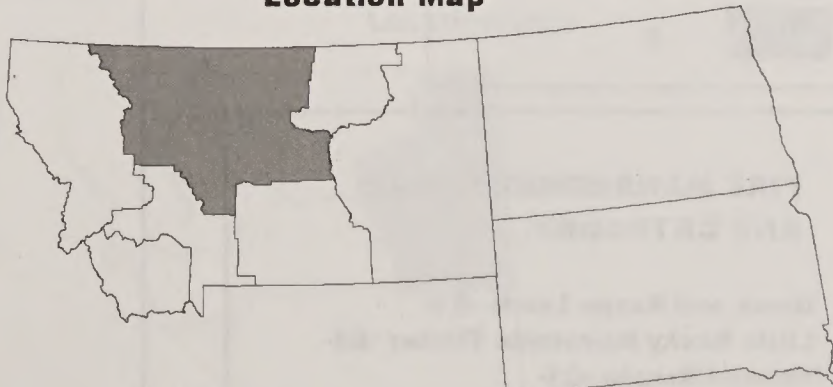
| | |
|---|---------------|
|  | NON-BLM LANDS |
|  | B |
|  | C |



FIRE MANAGEMENT ZONE AND CATEGORY

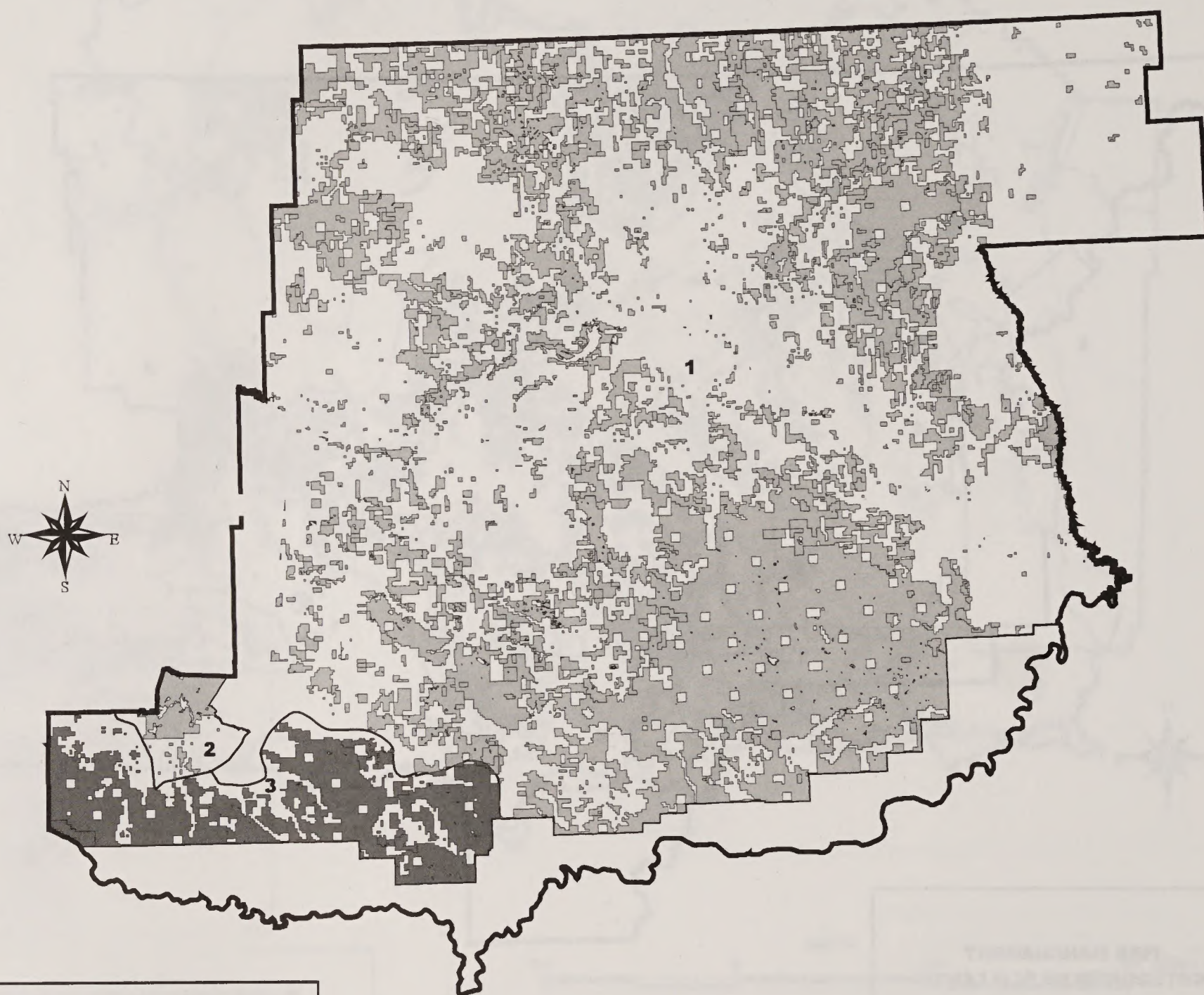
- 1 Timber/Mountain Range -B1-
- 2 Range/Grasslands -B2-
- 3 Breaks -C1-
- 4 Front Range -C2-

Location Map

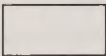
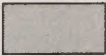



MAP 7

FIRE MANAGEMENT ZONES AND CATEGORIES OF BLM LANDS (Malta Field Office)



FIRE MANAGEMENT CATEGORIES OF BLM LANDS

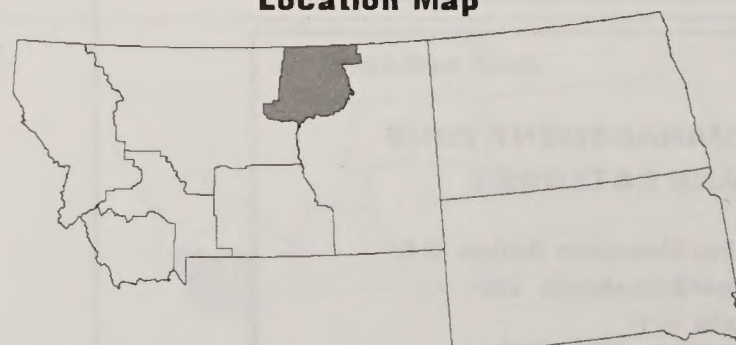
| | |
|---|------------------|
|  | NON-BLM LANDS |
|  | B |
|  | C |

20 0 20 40 Miles

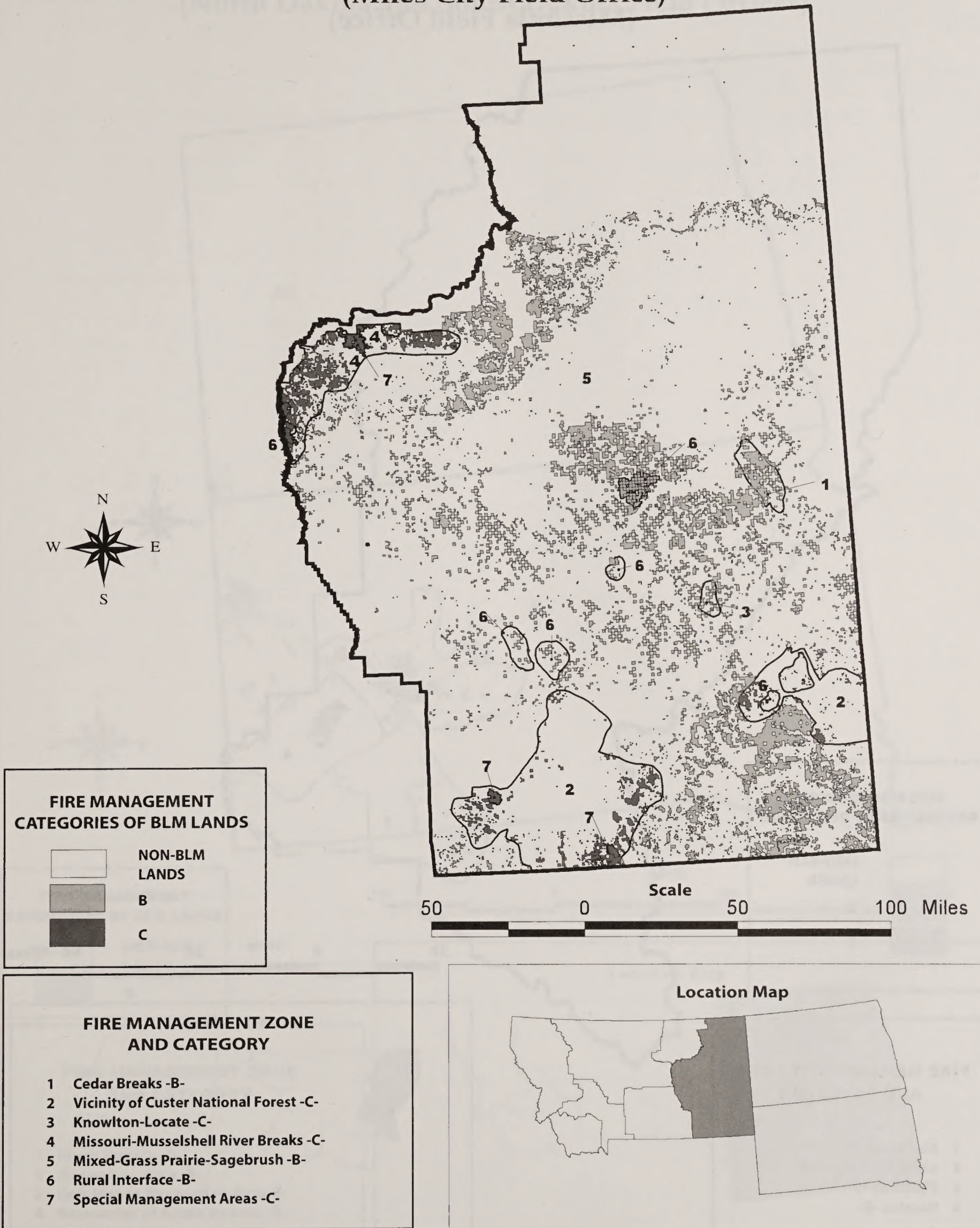
FIRE MANAGEMENT ZONE AND CATEGORY

- 1 Grass and Range Lands -B1-
- 2 Little Rocky Mountains Timber -B2-
- 3 Missouri Breaks -C1-

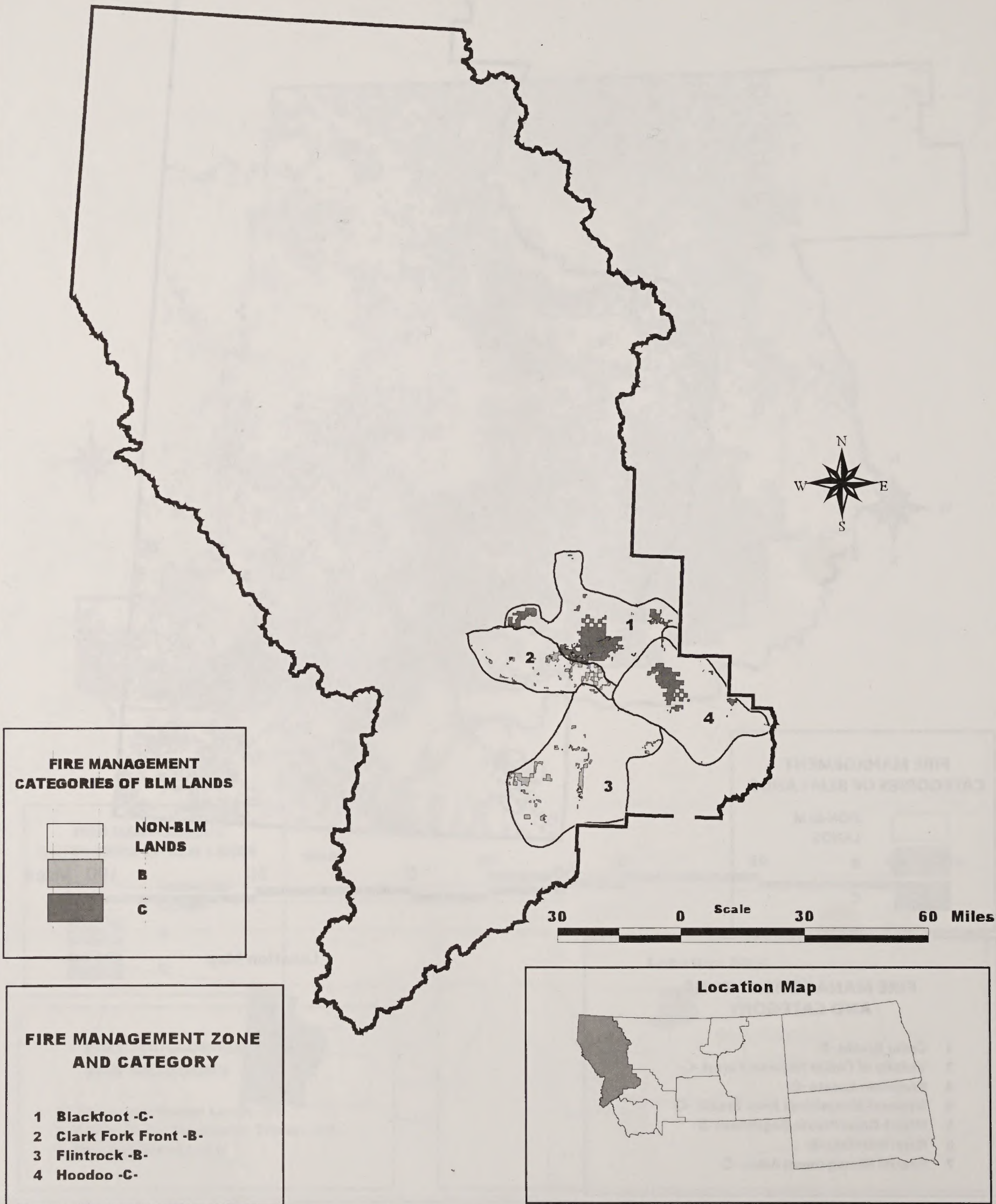
Location Map



MAP 8 FIRE ZONES AND CATEGORIES OF BLM LANDS (Miles City Field Office)



MAP 9 FIRE MANAGEMENT ZONES AND CATEGORIES OF BLMLANDS (Missoula Field Office)



MAP 10 FIRE MANAGEMENT ZONES AND CATEGORIES OF BLMLANDS (North Dakota and South Dakota Field Offices)

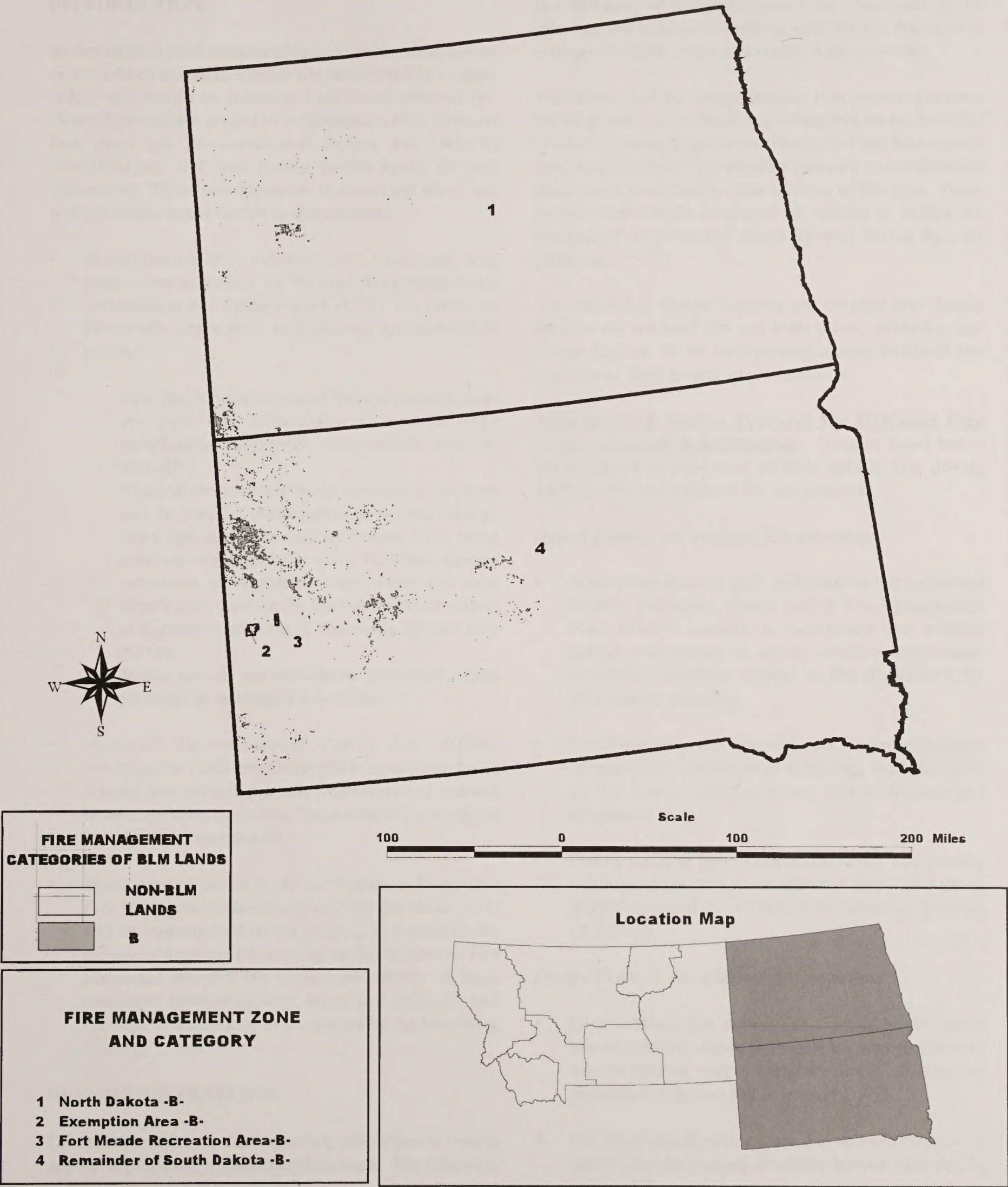


PLATE 10 FIRE MANAGEMENT ZONES AND CATEGORIES OF RISK (North Dakota and South Dakota)



Appendix B—Wildlife Design Features under the Proposed Action

INTRODUCTION

As described in other sections of this document, some actions or procedures related to wildlife are determined by existing policy and would be followed under both alternatives. General procedures related to rehabilitation after wildland fire, National Environmental Policy Act (NEPA) coordination, and monitoring would apply to both alternatives. These procedures are summarized below, and will not be discussed further in this appendix.

- *Rehabilitation after wildland fire:* Consistent with Departmental Policy on Burned Area Emergency Stabilization and Rehabilitation (ESR), the following factors affecting wildlife are addressed through the ESR process:
 - Emergency Stabilization or Rehabilitation actions are generally undertaken to reduce risks significantly or to improve lands unlikely to recover naturally.
 - If natural recovery is unlikely, plantings or seedings may be used for stabilization, to prevent T&E or other Special Status Species habitat from being permanently impaired, or to facilitate natural succession of vegetative communities that were largely native before the fire but would be subject to aggressive invasion of non-native species after the fire.
 - Native species are considered preferable where plantings or seedings are necessary.
- *National Environmental Policy Act (NEPA) coordination:* Fuels treatments will be coordinated with stakeholders, including private landowners and state and federal agencies (including those with responsibilities for wildlife management).
- *Monitoring (Refer to BLM 9214 Manual-Prescribed Fire Management Handbook, or 2002 Red Book, 6-11)* will be implemented on the projects to determine the success of the project in meeting project objectives. Fire personnel monitor the immediate effects of fuels treatment (including first order fire effects), and subsequent monitoring is completed by the benefiting activity.

NEW DESIGN FEATURES

Design features are standard operating procedures or criteria applied to proposed projects on public lands. The following

is a summary of design features to be considered in fire planning and in projects implemented through contracts or with government employees (under Alternative B).

The objective of the design features is to provide guidance for the protection of wildlife and habitat that are not provided in other planning or guidance. Threatened and Endangered Species protection is provided by recovery or conservation plans and is described in other sections of this plan. These design criteria were developed for species or habitat not designated or protected under Special Status Species programs.

The following design features are divided into design features for wildland fire and fuels project planning, and design features to be incorporated during wildland fire response or fuels project implementation.

Alternative B Design Features for Wildland Fire Suppression and Rehabilitation: Features listed below are designed to minimize wildlife habitat loss during wildland fire and wildland fire suppression.

Design features for wildland fire planning:

- Appropriate resource staff, including fire specialists and wildlife biologists, should review Fire Management Plans (FMPs) annually to incorporate new wildlife habitat information in setting wildfire suppression priorities. Distribute updates to fire dispatchers for initial attack planning.
- Avoid disturbance or degradation of designated habitats of concern by placement of temporary facilities (such as fire camps, staging areas, and helibases) and infrastructure.
- During multiple ignition episodes ensure that priority wildlife habitat data are available during initial attack and incorporated into Wildland Fire Situation Analyses (WFSAs).

Design Features for wildland fire response:

- Give wildland fire suppression priority to designated known wildlife habitat, especially known special status species habitat, unless doing so would compromise protection of human life or property.
- Use direct attack tactics when it is safe and effective at minimizing the amount of wildlife habitat imperiled by wildland fire.

- Retain unburned areas (including interior islands and patches between roads and fire perimeter) of wildlife habitat, unless doing so would compromise safety, resource protection, or wildfire control objectives.
- Minimum Impact Suppression Tactics (MIST) (See Red Book for description) or light-on-the-land tactics should be considered during fire suppression in high priority wildlife habitat (such as sagebrush habitats).

Alternative B Design Features for Fuels Management:

Design features for fuels management planning:

- Cumulative effects of wildfires and vegetation treatments on wildlife habitat in the area should be considered in site-specific NEPA analyses.
- Where appropriate, adopt vegetation treatments in wildlife habitat areas to control invasive weeds and aid the recovery of native vegetation.
- Wildlife habitat enhancements should be included in fuels project design when feasible.
- Fire Management Plans (FMPs) should identify crucial wildlife habitat needs. Where appropriate, existing wildlife protection measures from other programs (i.e., oil and gas) should be adopted.
- Field Office Fire Management Plans should include measures to reduce or minimize impacts to migratory birds.

Design Features for fuels project implementation:

- Fuels projects should be designed to enhance wildlife species and habitat diversity in concert with fuels management objectives by:
 - Burning in a mosaic pattern to create ecotones or edge effect in vegetation
 - Using mechanical treatments to create diversity in burn patterns in areas where fuel type and loadings are contiguous

Grassland features:

- If treatment areas are dominated by exotic annual grasses (such as cheatgrass) projects should include restoration and, if necessary, reseeding to re-establish native vegetation.

Forestland and woodland features:

- General: Treatments should maintain snags and down woody debris as important habitat features. The amount of snags and debris should be based on apparent natural occurrence in the larger area surrounding fuels projects.
- Aspen: Fuels treatments in aspen stands could be used to improve vigor, stimulate regeneration, increase vegetative diversity, and preserve the genetics of aspen clones in degraded aspen stands.
- Juniper: To achieve fuels management benefits while minimizing impact to wildlife, treatments should focus on dense young juniper as opposed to mature, large juniper. Data from Maser and Gashwiler (1977) suggest that mature or old and decadent juniper stands harbored the most avian and mammal species. Additionally, Sauder (2002) found that areas with high densities of young juniper have the lowest abundance and diversity of birds. Manage ecotones to have juniper with prominent shrub understories to promote wildlife diversity.

Shrubland features:

- Sagebrush: Vegetation management strategies should be consistent with historical succession and disturbance regimes. Strategies should be based on comparison of historical and current ecological processes and landscape patterns, and should address the habitat needs of sage grouse and other sagebrush dependent species.
- Fuels treatments in sage grouse habitats would be carefully analyzed, including consideration of available historical and current ecological processes and landscape patterns. Treatments should consider the habitat needs of migratory and non-migratory sage grouse populations, as determined from available habitat data, scientific research (such as Connelly et al 2000), and existing management guidance.
- Shrubs along riparian zones, meadows, lake beds, and farmlands should be maintained to provide habitat diversity, forage, and hiding cover for wildlife.

Appendix C— Resource Management Plan (RMP) Amendments Under the Proposed Action

The following narrative constitutes the language that would amend RMPs under the Proposed Action. Two distinct types of amendments would be achieved: the first section, All RMPs, contains the language with which all BLM RMPs for Montana and the Dakotas would be amended. The second section, Specific Decisions, contains the language that would amend certain additional decisions in specified RMPs.

All RMPs

The Big Dry, Billings, Garnet, Headwaters, Judith-Valley-Phillips, North Dakota, Powder River, South Dakota, and West HiLine RMPs, would be amended to include the following:

- Fire Management Zones and corresponding categories, as described in Tables 2 and 3, and the rationale (available in the administrative record).
- Direction for fire and fuels management needed to protect other resource values (described in section 2.5.3.1 of this EA).
- Broad levels of treatment over 10 years, as described by category in Table 2.

Specific RMPs

Big Dry RMP

Commercial timber sales will be allowed in all forest and juniper woodland types. Commercial and pre-commercial material may be removed to reduce fuel loadings and prepare the site for prescribed fire activities. Treatments will move the sites toward Desired Future Conditions and/or a fire resilient classification.

Sites that are in Fire Condition Class 2 may have commercial and pre-commercial material removed.

Sites that are in Fire Condition Class 3 will have pre-commercial and commercial material removed or treated prior to prescribed fire activities.

Sites that are in condition Class 1 may be treated with pre-commercial or commercial mechanical treatments and/or prescribed fire, if conifers are considered to be encroaching on shrubland and grassland/shrubland habitat types.

Wood product sales will be allowed on all forest and juniper woodland types in the planning area. The purpose is to reduce or maintain fuel loads, to achieve desired forest health conditions and to maintain wildlife values.

Pre-commercial thinnings, removals, and treatments will be allowed on all forest and juniper woodland sites that are Fire Condition Class 2 or 3 except for those special management areas identified in the RMP.

Use of ground based harvest and slash treating equipment will be limited to 40 percent slopes and less. Material removal may occur without equipment occupying the site on steeper slopes, by using equipment such as feller buncher booms, pulling cable and winching, helicopter yarding, and cable yarding.

Powder River RMP

Commercial timber sales will be allowed in all forest and juniper woodland types. Commercial and pre-commercial material may be removed to reduce fuel loadings and prepare the site for prescribed fire activities.

Sites that are in Fire Condition Class 2 may have commercial and pre-commercial material removed.

Sites that are in Fire Condition Class 3 will have pre-commercial and commercial material removed or treated prior to prescribed fire activities.

Prescribed fire may be used on all Fire Condition Class 2 sites and all Fire Condition Class 3 sites following treatment or removal of pre-commercial material and treatment or removal of commercial material. Prescribed fire treatment acres are unlimited.

Sites that are in condition Class 1 may be treated with pre-commercial or commercial mechanical treatments and/or prescribed fire, if conifers are considered to be encroaching on shrubland and grassland/shrub habitat types.

Judith, Valley, Phillips, West HiLine, and Billings RMPs

Harvest of merchantable timber as a result of community protection projects or hazardous fuels removal would be considered incidental under RMP allowable cut guidelines and not be counted against the yearly Allowable Sale Quantity (ASQ).

Sales of forest products would be coordinated with adjacent landowners and agencies where possible, and emphasize forest health and fuels reduction through sound silvicultural prescriptions. Offerings would be through both negotiated and public auction sales.

Implementation: A wide variety of silvicultural prescriptions may be used depending on fuels management objectives and site characteristics (e.g., tree size, age, species composition).

Appendix D—Description of the Riparian Protection Zone Strategy (Proposed Action)

Four biophysical principles underlie the development of any riparian/aquatic protection strategy. These are: 1) a stream requires predictable and near-natural energy and nutrient inputs; 2) many plant and animal communities rely on streamside forests and vegetation; 3) small streams are generally more affected by hill-slope activities than are larger streams; and 4) as adjacent slopes become steeper, the likelihood of disturbance resulting in discernable in-stream effects increases. (Quigley and Arbelbide, 1997).

Proposed fuels treatments will incorporate **Riparian Protection Zones (RPZs)** designed to protect specific key ecological functions of these areas. These are **not** necessarily no-treatment zones. Rather, they are areas where riparian resources and key functions receive primary management emphasis and design features must be applied to protect the key ecological functions. The key functions to be protected are:

- (1) **water quality**, to a degree that provides for stable and productive riparian and aquatic ecosystems;
- (2) **stream channel integrity**, channel processes, and the sediment regime (including the elements of timing, volume, and character of sediment input and transport) under which the riparian and aquatic ecosystems developed;
- (3) **instream flows** to support health riparian and aquatic habitats, the stability and effective function of stream channels, and the ability to route flood discharges;
- (4) **natural timing and variability** of the water table elevation in meadows and wetlands;
- (5) **diversity and productivity** of native and desired non-native plant communities in riparian zones.

Because stream types and riparian function are extremely variable across the planning area, an RPZ based on a minimum linear distance will not be applicable to every project. Thus, the width necessary to protect stream and riparian area structure and function should be determined from watershed and site-specific analysis.

Each project developed under this Environmental Assessment will incorporate specific design features to maintain the key ecological functions of the RPZs.

Project plans and Environmental Assessment should specifically document the analysis process used to determine final dimensions of RPZs. Recommended RPZ boundaries for projects carried out under this EA are described below. Based on a substantial body of theoretical and applied science, projects implemented using RPZ boundaries as

designated below will be much less likely to adversely affect aquatic species and their habitats. These should be considered default boundaries until final boundaries are determined by watershed or site-specific analysis. Final boundaries may be narrower or wider, depending on local conditions and results of the project specific analysis.

Interim Riparian Protection Zones-Forested Areas

Interim boundaries of the RPZs within forested zones of the planning area will be:

- (1) Streams, ponds, lakes containing Special Status Fish Species: two site-potential tree heights.
- (2) Other fishbearing streams: one site-potential tree height.
- (3) Ponds, lakes, and wetlands greater than 1 acre: the interim RPZ consists of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or to a distance equal to one site-potential tree height (whichever is greatest)

The interim boundaries for RPZs within forested zones of the planning area are based on site-potential tree height. The maximum height of dominant trees is one of the most significant factors influencing the extent of the streamside area directly affecting channel and aquatic ecosystem function. For instance, tall trees potentially contribute shade, particulate organic matter, and large woody debris at greater distances from streams than do short trees. Areas capable of producing large tall trees thus possess wider functional riparian zones than areas in which trees do not grow as large. For this reason, FEMAT (1993), PACFISH (1995), and INFISH (1995) used the height of dominant late-successional tree species that would naturally grow in a particular riparian zone as the basis for reconnecting streamside buffers needed to safeguard ecological functions instead of a fixed “one-size-fits-all” linear distance. Use of a fixed distance from the streambank to the outer margin of the buffer strip would not allow for differences in potential tree growth between regions.

Interim Riparian Protection Zones-Non-Forested Areas

In non-forested rangeland ecosystems, the interim RPZ would consist of the body of water or wetland and the area to the outer edges of the riparian vegetation, or to the extent

of the seasonally saturated soil, or to the extent of moderately and highly unstable areas, or (in segments where trees are present) to a distance equal to one site-potential tree height (whichever is greatest).

Design Features for Isolated Populations

The EA identified particular risk from wildfire and fuels management projects to isolated, depressed populations in degraded habitats without access to local or regional refugia (e.g. westslope cutthroat trout). All projects carried out under

this EA will incorporate the following to ensure that potential effects to these species are reduced to non-significant levels:

- (1) areas proposed for fuels reduction projects will be surveyed for the presence of these populations
- (2) During project-specific NEPA analysis, project planners will include a specific assessment for these species. The assessment will specifically identify potential sources or risk and the specific design features incorporated in the project to avoid adverse effects or to mitigate them to the insignificant level.

Finding of No Significant Impact (FONSI)

Based on the analysis of the potential impacts contained in the attached environmental assessment and careful consideration of public comments, I have determined that Alternative B, the proposed fire/fuels management plan, will have no significant impact on the human environment. An environmental impact statement does not need to be prepared.

Support for the FONSI:

The following **Critical Elements** will not be significantly affected by applying management as analyzed for Alternative B:

Air Quality: The anticipated activity associated with Alternative B will not exceed state or federal ambient air quality standards as a result of fire and fuels management and will not significantly contribute to cumulative air quality effects. If and when wildland fire is managed to achieve resource objectives in C and D category polygons, notification standards similar to those for prescribed fire will be followed.

Areas of Critical Environmental Concern: ACECs and ACEC values will not be affected by fire and fuels related activities because ACEC status will be considered for fire management actions and in site-specific implementation assessments for hazardous fuels reduction projects.

Cultural Resources: Archeological resources that are considered eligible for the National Register of Historic Places (NHRP) will either be avoided or, in consultation with State Historic Preservation Officer (SHPO), a plan for mitigating the effects of the proposed actions will be formulated and implemented. In addition, sites for fuels management activities will be examined for other cultural and paleontological resources before any activity occurs. Anticipated impacts from fuels management activities will be avoided or mitigated. The proposed fire management plan will provide fire management objectives and more guidance for wildland fire suppression and rehabilitation as well as guidance for fuels reduction actions to protect cultural resources.

Environmental Justice: Alternative B will not cause disproportionately high or adverse effects on human health or environmental effects on low-income or minority populations, as provided under Environmental Justice considerations.

Farmlands (Prime or Unique): Neither the proposed management associated with wildland fire suppression nor

the proposed fuels management actions will contribute to the unnecessary and irreversible conversion of prime or unique farmland to nonagricultural uses.

Floodplain: No developments or effects of developments associated with fire/fuels management BLM will occur in floodplain.

Invasive Species: While some activities and land uses will introduce and/or spread noxious weeds, the management guidance and anticipated chemical weed treatments associated with hazardous fuels projects will mitigate or control the spread of invasive and non-native species.

Native American Religious Concerns: Alternative B will not interfere with the inherent right of freedom to believe, express, and exercise traditional religions, including access to religious sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites established in the American Indian Religious Freedom Act of 1978.

Threatened or Endangered Species: Significant impacts are not anticipated from the proposed fire and fuels management (Alternative B) and related actions for species listed as endangered or threatened, and species proposed for listing. Nor will significant impacts occur to the species of birds, mammals, reptiles and amphibians, fish, and plants designated as BLM sensitive species. Anticipated impacts to threatened or endangered species were analyzed in a Biological Assessment. The Biological Opinion/Concurrence Opinion from the US Fish and Wildlife Service affirmed the following determinations made in the BA:

- For Listed Species: Either No Effect or May Affect but is not likely to Adversely Affect for listed species
- For Proposed Species: Not Likely to Jeopardize the Species
- For Proposed Critical Habitat: Would not adversely modify proposed critical habitat

The Biological Opinion concluded that Alternative B is not likely to jeopardize the continued existence of grizzly bears, Canada Lynx, bald eagles, gray wolves, bull trout, or the proposed critical habitat for bull trout.

Wastes, Hazardous or Solid: It is not expected that future activities and effects associated with Alternative B will conflict with either CERCLA or RCRA. Compliance with environmental laws and regulations should not result in significant impacts associated with hazardous or solid wastes.

Water Quality, Drinking or Ground: Alternative B will not affect water quality in a way to exceed standards established under the Safe Drinking Water Act of 1974. Activities anticipated with Alternative B will be regulated to control non-point sources of water pollution to comply with The Clean Water Act, as amended by the Water Quality Act of 1987 (including Total Maximum Daily Load Requirements). Fuels management activities would be conducted in a way to meet state water quality standards as specified in the Standards for Rangeland Health and Guidelines for Grazing Management. Although water quality impacts will result from the use of prescribed fire and mechanical treatments to reduce hazardous fuels, these impacts would be offset by reduced impacts from wildland fires. Also, a Pesticide Use Proposal will be submitted and approved before any chemical treatments occur on site.

Wetlands/Riparian Zones: The impacts of severe wildland fire and future needs for emergency wildfire suppression will be reduced. The potentially greater risks associated with higher levels of fuels treatment will not reach significant levels because of the guidelines included in Alternative B. Actions associated with fire and fuels management related actions will be conducted to minimize the destruction, loss, or degradation of wetlands and riparian areas while preserving and enhancing their natural and beneficial values. Few wetland or riparian areas will be treated for fuels management.

Wild and Scenic Rivers: The BLM currently manages land along one designated Wild and Scenic River. During scoping and subsequent analysis, no issues were identified concerning the relationship of fire and fuels management to the Upper Missouri Wild and Scenic River designation.

Wilderness: Wilderness and Wilderness Study Area (WSA) policy requires that special consideration and restrictions will be applied in wildland fire suppression, rehabilitation, prescribed fire, and other hazardous fuel reduction efforts so as not to impair the characteristics for which they received designation.

Significant impacts are not anticipated for the additional resources that were not discussed above as critical elements. Specifically:

Fire and fuels management related activities associated with Alternative B will be applied to only about 2 percent of BLM-administered grasslands, 3 percent of BLM-administered shrublands, and 37 percent of BLM-administered forestlands. These activities will not cause a significant adverse impact to the ecological health of the vegetation. Generally, the vegetation communities that are treated will convert to an earlier successional stage, stimulating new growth. In the long term, total productivity will improve, especially in treated forestlands. At the same time, fire severity on treated areas will decrease, as will the

risk of catastrophic stand replacement wildland fire. Associated impacts caused by wildland fire suppression activities will also decrease.

Chemical weed treatments will be applied if other fuels treatments are expected to stimulate noxious weed growth or create new infestations.

Use of chemical weed treatments will be consistent with label directions for chemical use, BLM Manual 9011, BLM Handbook H9011-1 Chemical Pest Control Guidance, the Riparian Protection Zone guidance (under Alternative B, See section 2.5.3.1), and guidelines outlined in *Partners Against Weeds: An Action Plan for the Bureau of Land Management* (1996) to avoid significant impacts.

Increased soil loss, sedimentation, and turbidity in the water as the result of prescribed fire and other fuels treatments will be minimized by complying with existing environmental protection requirements, conservation and species protection requirements, agreements, strategies, standard operating procedures, manual and handbook guidance, and other protection measures including proposed additional guidance for fire and fuels management. There will also be less soil loss, sedimentation, and turbidity from wildland fire on areas that are treated than if there is a stand replacement fire because they are not treated. Impacts to soils and water quality will also be reduced because the area burned from wildland fire and the intensity and severity of these wild fires will be less. Treatments anticipated with Alternative B will help achieve land health standards (soil stability and watershed function) on more areas.

Alternative B will involve the selective introduction of fire and fuels management to certain wildlife habitats. Application will be managed to avoid times and sites where prescribed fire and other treatments are not desired. These treatments will reduce the likelihood of adverse effects from wildland fire. The cumulative effects of the proposed action will have less impact to wildlife habitat and wildlife populations than the effects of the large, catastrophic, stand-replacement wildfires that result in drastic changes in ecological condition from late seral climax vegetation to an early seral stage.

Recreation and visual impacts of wildland fires will be reduced. The likelihood of protecting high quality recreation areas will also be enhanced. By reducing the long-term potential for stand-replacement wildland fire, the potential for severe impacts to visual resources and recreation opportunities will also be reduced.

Alternative B will provide greater protection to human health and safety by broadening the range of allowable methods that can be used to reduce the potential for severe wildland fires on BLM lands near the wildland urban interface, including several communities and developments

that have been identified by the BLM as priority areas. Applying the management analyzed with Alternative B will allow the BLM to reduce the potential for loss of life and property; reduce the risk and resource damage associated with wildland fire suppression; and reduce the negative health effects caused by the smoke from catastrophic wildland fires. Although Alternative B will result in the use of more prescribed burning, the timing and size of these fires will be controlled to operate within acceptable limits imposed by air quality standards.

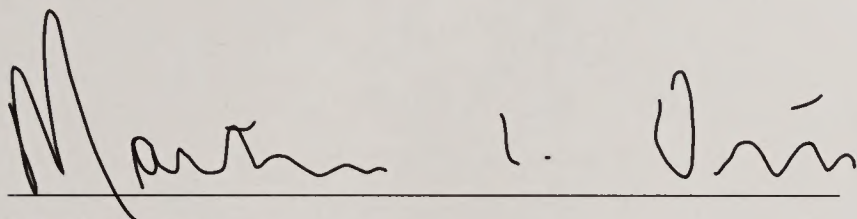
Alternative B is consistent with the preferences voiced by the public for active fire and fuels management. The effects will be preferable because fuels treatments will be mitigated, designed, or planned to minimize health and safety concerns, visual impacts, and other quality of life issues.

This analysis did not identify effects to the human environment that are considered highly controversial, highly uncertain or involve unique or unknown risks.

The actions associated with the proposed fire and fuels management will not establish a precedent for future actions with significant effects or represent a discussion in principle about a future consideration. Nor will they violate federal, state, or local laws or requirements imposed for the protection of the environment.

Based on the analysis of individual and cumulative management actions and anticipated activities, I have determined that Alternative B (the proposed action) does not constitute a significant environmental impact.

Signed:



Martin C. Ott
State Director for Montana/Dakotas
Bureau of Land Management

7/14/03

Date

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